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ESMERALDA - SOUTHERN NYE
PROPOSED RESOURCE MANAGEMENT PLAN and FINAL ENVIRONMENTAL IMPACT STATEMENT

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Las Vegas District, Las Vegas, Nevada
Battle Mountain District, Battle Mountain, Nevada

IN REPLY REFER TO:

1610
(NV-050)

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
NEVADA STATE OFFICE
300 Booth Street
P.O. Box 12000
Reno, Nevada 89520

October 4, 1985

Dear Reader:

Enclosed for your review is the Proposed Esmeralda-Southern Nye Resource Management Plan and Final Environmental Impact Statement (PRMP/FEIS). This document is a culmination of the Bureau's planning process for the 3.4 million acres of public land within the Esmeralda-Southern Nye Planning Area in the Las Vegas and Battle Mountain Districts, Nevada.

The FEIS has been printed in accordance with the National Environmental Policy Act regulations, and should be used in conjunction with the Esmeralda-Southern Nye Draft RMP/EIS (INT DRMP/EIS 84-60).

The final document consists of a summary; management prescriptions; revisions, additions and errata; and an expanded public participation section containing comments and responses to the Draft.

A formal protest period of 30 days will extend until November 4, 1985. Comments will be considered in the decision-making process. Protests must be made in writing to the Director, Bureau of Land Management, 18th and C Streets, N.W., Washington, D.C. 20240.

Wilderness recommendations in this plan are preliminary and are not subject to protest at this time. A separate legislative final environmental impact statement for wilderness will be prepared as required by Bureau Wilderness Study Policy.

After the 30-day protest period, a record of decision will be issued. Approval shall be withheld on any portion of the plan under protest until the final action has been completed on such protest. The record of decision will be issued in several months.

Sincerely yours,

Edward F. Spang
State Director, Nevada

1 Enclosure:
Encl. 1 - Esmeralda - Southern Nye Proposed Resource Management Plan and Final Environmental Impact Statement

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PROPOSED RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT for the ESMERALDA-SOUTHERN NYE PLANNING AREA NEVADA

Prepared by the

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
LAS VEGAS DISTRICT

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
BATTLE MOUNTAIN DISTRICT

Edward F. Spang
Nevada State Director

The proposed resource management plan is the long-range plan to manage 3.4 million acres of public land within the Esmeralda-Southern Nye Planning Area. The plan has been prepared in response to Sections 202 and 603 of the Federal Land Policy and Management Act of 1976 that requires the Bureau of Land Management to develop land use plans for the public lands and to study the suitability of certain lands for wilderness designation. An integral environmental impact statement assesses the environmental consequences of the plan.

This document is both the proposed resource management plan and the final environmental impact statement. The final resource management plan will be approved by the State Director and published in a record of decision following public review of this document. Wilderness recommendations in the plan are preliminary and subject to change during administrative review. A separate legislative final environmental impact statement for wilderness has been prepared as required by the Bureau's Wilderness Study Policy.

For further information contact: Stephen Mellington, Project Manager, Bureau of Land Management, P.O. Box 26569, Las Vegas, Nevada 89126 or telephone (702-388-6403).

Date this final statement was made available to the Environmental Protection Agency and to the Public: October 4, 1985.

INT FEIS 85-39

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SUMMARY

SUMMARY

The Bureau of Land Management is proposing to implement a Resource Management Plan (RMP) for the Esmeralda-Southern Nye Planning Area. This RMP area contains portions of two different resource areas in two different districts. To aid in the development as well as the readability of the plan, the RMP area was subdivided into two discrete areas. Planning Area A is the area managed by the Tonopah Resource Area out of the Battle Mountain District and includes all of Esmeralda County and that portion of Nye County west of the bombing range down to approximately six miles south of Beatty. Planning Area B is the area managed by the Stateline Resource Area of the Las Vegas District and includes the remainder of southern Nye County (see Location Map).

The RMP is designed to provide overall management direction for those resources or uses found on public lands in the RMP area. The five alternatives analyzed in the document were developed around the three issues identified during scoping. An environmental impact statement analyzes the effects of implementing the five alternatives and is an integral part of this document. The Preferred Alternative has been selected as the Proposed Resource Management Plan.

PLANNING ISSUES

The following three resource management issues are addressed in the alternatives.

ISSUE 1: WILDERNESS

What wilderness study area (WSAs) or portions of WSAs, if any, should be designated as wilderness?

ISSUE 2: LAND TENURE AND UTILITY CORRIDORS

What public lands should be disposed of to enhance management or provide for urban/suburban expansion within the RMP area?

Should utility and planning corridors be designated and, if so, how many and where?

ISSUE 3: RANGELAND MANAGEMENT

How should the RMP area be managed for livestock use, wild horse and burro use, and wildlife habitat?

ALTERNATIVES

PREFERRED ALTERNATIVE/PROPOSED RESOURCE MANAGEMENT PLAN

This alternative strives to balance competing demands by providing for production of needed goods and services, while protecting important environmental values. It reflects changes from the draft based on public and State Government review.

NO ACTION ALTERNATIVE

This alternative represents a continuation of present resource management and use levels.

ALTERNATIVE A

This alternative emphasizes livestock production, wildlife numbers, land disposals, and utility and planning corridor designations. It de-emphasizes wilderness values and reduces wild horse and burro numbers.

ALTERNATIVE B

This alternative emphasizes wild horse

and burro use, wildlife numbers and wilderness values. It provides a "mid-range" approach toward wilderness designation, land disposal, and utility and planning corridors and de-emphasizes livestock grazing.

ALTERNATIVE C

This alternative represents the elimination of livestock grazing on public lands. It strives to maximize wildlife numbers and acreages recommended for wilderness designation. In addition, this alternative identifies minimum land disposal and corridor designation and reduces wild horse and burro numbers.

Comparative summaries of major management prescriptions and environmental consequences of each alternative are displayed in Summary Tables 1 and 2, respectively.

SUMMARY TABLE 1
ESMERALDA-SOUTHERN NYE RMP ALTERNATIVES
SUMMARY OF MANAGEMENT PRESCRIPTIONS

Issue	Preferred	No Action	Alternative A	Alternative B	Alternative C
Wilderness	Recommend 17,850 acres in one area for wilderness designation (9%).	Recommend no areas for wilderness designation (0%).	Recommend 17,850 acres in one area for wilderness designation (9%).	Recommend 99,420 acres in three areas for wilderness designation (52%).	Recommend 189,675 acres in five areas for wilderness designation (100%).
Land Tenure	Identify a pool of 94,949 acres for disposal.	Continue existing case-by-case management.	Identify a pool of 245,807 acres for disposal.	Identify a pool of 188,857 acres for disposal.	Identify a pool of 10,235 acres for disposal.
Corridors	Designate 357 miles of utility corridors and identify 30 miles of planning corridors.	Approve rights-of-way on a case-by-case basis.	Designate 422 miles of utility corridors and identify 80 miles of planning corridors.	Designate 334 miles of utility corridors and identify 72 miles of planning corridors.	Designate 230 miles of utility corridors and identify 22 miles of planning corridors.
Rangeland Management					
Livestock Grazing	Authorize livestock use at 46,013 AUMs. Implement intensive management on Category I allotments. Close the Ash Meadows and Emigrant Peak Allotments to livestock grazing. Monitor and adjust use as findings indicate.	Continue existing use of 46,013 AUMs.	Increase livestock to 62,012 AUMs (35% increase). Implement intensive management.	Reduce livestock use to 32,208 AUMs (30%) Implement intensive management on Category I allotments. on Category I allotments.	Eliminate livestock grazing from public lands.
Wild Horse and Burro	Manage for current level of 1127 and 357 herd, head,respectively in 13 management areas. Monitor and adjust use as findings indicate.	Manage for current levels of 1127 and 357 head respectively.	Reduce numbers to 410 and 143 head, respectively. (64% and 60%) decrease).	Allow for increase to 1513 and 477 head respectively (34% increase).	Reduce numbers to 427 and and 248 head respectively (62% and 30% decrease). Eliminate three herd use areas.
Wildlife	Manage current and historic big game habitat with a goal of achieving reasonable numbers. Modify the Ash Meadows HMP.	Manage current big game habitat for current numbers.	Manage current big game habitat with a goal of achieving reasonable numbers. Modify the Ash Meadows HMP.	Management current big game habitat with a goal of achieving reasonable numbers. Modify the Ash Meadows HMP.	Manage current and historic big game habitat with a goal of achieving reasonable numbers. Modify the Ash Meadows HMP.

SUMMARY TABLE 2

COMPARATIVE REVIEW OF THE ENVIRONMENTAL CONSEQUENCES OF THE ALTERNATIVES OVER THE LONG TERM

Environmental Component	Alternative a/ Preferred	No Action	A	B	C
Vegetation b/ Percent change in ecological condition	+1%	-7%	-5%	+3%	+6%
Wildlife c/					
Bighorn sheep population(% change)	1858(287%)	480(0%)	841(75%)	617(28%)	1858 (287%)
Mule deer population (% change)	1259 (150%)	504(0%)	699(39%)	379(-25%)	1259(150%)
Elk population (% change)	33 (136%)	14(0%)	0(-100%)	23 (64%)	35(136%)
Wild Horses and Burros c/					
Short term population (% change)	1127/357(0%/0%)	1127/357(0%/0%)	410/143(-64%/-60%)	1513/477(34%/34%)	427/248(-62%/-30%)
Livestock Grazing c/					
Projected livestock use (AUMs)(% change)	45,884(-.3%)	44,949(-2%)	43,480(-6%)	45,957(-.1%)	0(-100%)
Land Disposal					
Acres disposed	94,949	0 d/	245,807	188,857	10,235
Corridors					
Miles designated utility/identified planning	357/30	0/0 d/	422/80	334/72	230/22
Minerals					
Acres of moderate or high metallic mineral potential withdrawn	13,890	0	13,890	48,830	83,325
Wilderness					
Acres recommended suitable (%)e/	17,850 (9%)	0(0%)	17,850(9%)	99,420(52%)	189,675(100%)

a/ All impacts are long term (20 years) unless otherwise noted.
b/ Change from current condition
c/ Change from current numbers
d/ Land disposal and rights-of-way will be on a case-by-case basis.
e/ Percent of acres within the wilderness study areas.

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

ESMERALDA PLANNING AREA
Proposed Resource Management Plan
and
Final Environmental Impact Statement

LOCATION MAP

1985

CHAPTER 1

INTRODUCTION, PLANNING PROCESS OVERVIEW, and PLANNING ISSUES.

Chapter 1
INTRODUCTION, PLANNING PROCESS OVERVIEW AND ISSUES

INTRODUCTION

This document is intended to be used in conjunction with the Draft Esmeralda-So. Nye Planning Area Resource Management Plan and Environmental Impact Statement (RMP/EIS). This document presents the proposed resource management plan; public comment on the draft RMP/EIS; Bureau responses to these comments; and revisions, errata, and additions to the draft RMP/EIS. Since the changes are minimal, the entire RMP/EIS was not reprinted in this document pursuant to Council of Environmental Quality regulations (40 CFR 1503.4 (b)).

PURPOSE AND NEED

The Esmeralda-Southern Nye Resource Management Plan (RMP) is designed to provide a framework for future management of the public lands in the RMP area. Although comprehensive in nature, it is not intended to make program decisions for individual resource elements, but to provide the overall multiple-use objectives and management directions for the planning area.

This document is prepared pursuant to Section 202 of the Federal Land Policy and Management Act of 1976 (FLPMA) which requires that the Secretary of the Interior shall, with public involvement, develop land use plans which provide for the use of public lands. The National Environmental Policy Act of 1969 (NEPA) requires federal agencies to prepare statements analyzing the environmental consequences of federal actions significantly affecting the human environment. This land use plan qualifies as a significant action and therefore an EIS was prepared.

This plan is focused on resolving three key issues and several statutory or court-ordered requirements. These issues are discussed in detail later in this chapter. A 1973 suit was filed in federal court by the Natural Resources Defense Council et. al., concerning the adequacy of BLM's programmatic grazing EIS and resulted in certain court orders. This document fulfills these court requirements by analyzing five specific alternatives for livestock grazing on public land.

As required under Section 603 of FLPMA, this document analyzes preliminary wilderness suitability recommendations for wilderness study areas located in the planning area. In accordance with BLM policy, the following procedure is used in addressing environmental concerns pertaining to wilderness designation.

Environmental impacts of wilderness designation are incorporated into the Bureau planning process through the draft RMP stage. The draft RMP document presents in summary form the impact to wilderness and other resources created by each alternative. Comments received on the draft RMP/EIS pertaining to wilderness are presented in this final RMP/EIS and will also be presented in a Final Esmeralda-Southern Nye Wilderness EIS to be published as a separate document from the final RMP. The final Wilderness EIS and a Wilderness Study Report will be submitted through the BLM Director and Secretary of the Interior to the President. The recommendations contained in this final wilderness EIS will be preliminary because they are subject to administrative review before they are presented to Congress for legislative action. More detailed

information is incorporated into the Esmeralda-Southern Nye Wilderness Technical Report which is available on request.

In addition, this planning action serves to update land use planning guidance contained in two separate Management Framework Plans (MFPs). They are the Esmeralda and Stateline MFPs completed in 1977 and 1975, respectively. The decisions in the MFPs have been carried forward into this RMP where applicable. These are reflected in the "Proposed Plan Management Guidance" section of Chapter 2. The decisions in this RMP will supercede the decisions in the two MFPs for the planning area dealing with the issues identified. Past management decisions unaltered by this plan remain in effect until changed utilizing standard Bureau decision procedures.

PLANNING PROCESS OVERVIEW

The BLM resource management planning process consists of nine basic steps (we are now at Step 8) and requires the use of an interdisciplinary team for the completion of each step. The planning steps described in the regulations and used in preparing this plan are described below and are graphically illustrated in Figure 1-1.

Step 1: Identification of Issues

This step is intended to identify resource management problems or conflicts that can be resolved through the planning process.

Step 2: Development of Planning Criteria

During this step preliminary decisions are made regarding the kinds of information needed to clarify the issues, the kinds of alternatives to be developed, and the factors to be considered in evaluating alternatives and selecting a proposed resource management plan.

Step 3: Inventory Data and Information Collection

This step involves the collection of various kinds of issue-related resource, environmental, social, economic, or institutional data needed for completion of the process.

Step 4: Analysis of the Management Situation

This step calls for a deliberate assessment of the current situation. It includes a description of current BLM management guidance, a discussion of existing problems and opportunities for solving them, and a consolidation of existing data that is needed to analyze and resolve the identified issues.

Step 5: Formulation of Alternatives

During this step several complete, reasonable resource management alternatives are prepared; including one for no action which represents a continuation of present activities and several that strive to resolve the issues while placing emphasis either on environmental protection or resource production.

Step 6: Estimation of Effects of Alternatives

The physical, biological, economic and social effects of implementing each alternative are estimated in order to allow for a comparative evaluation of impacts.

Step 7: Selection of the Preferred Alternative

Based on the information generated during Step 6, the District Manager identifies a preferred alternative. The draft RMP/EIS document is then prepared and distributed for public review.

STEPS IN THE RESOURCE MANAGEMENT PLANNING PROCESS

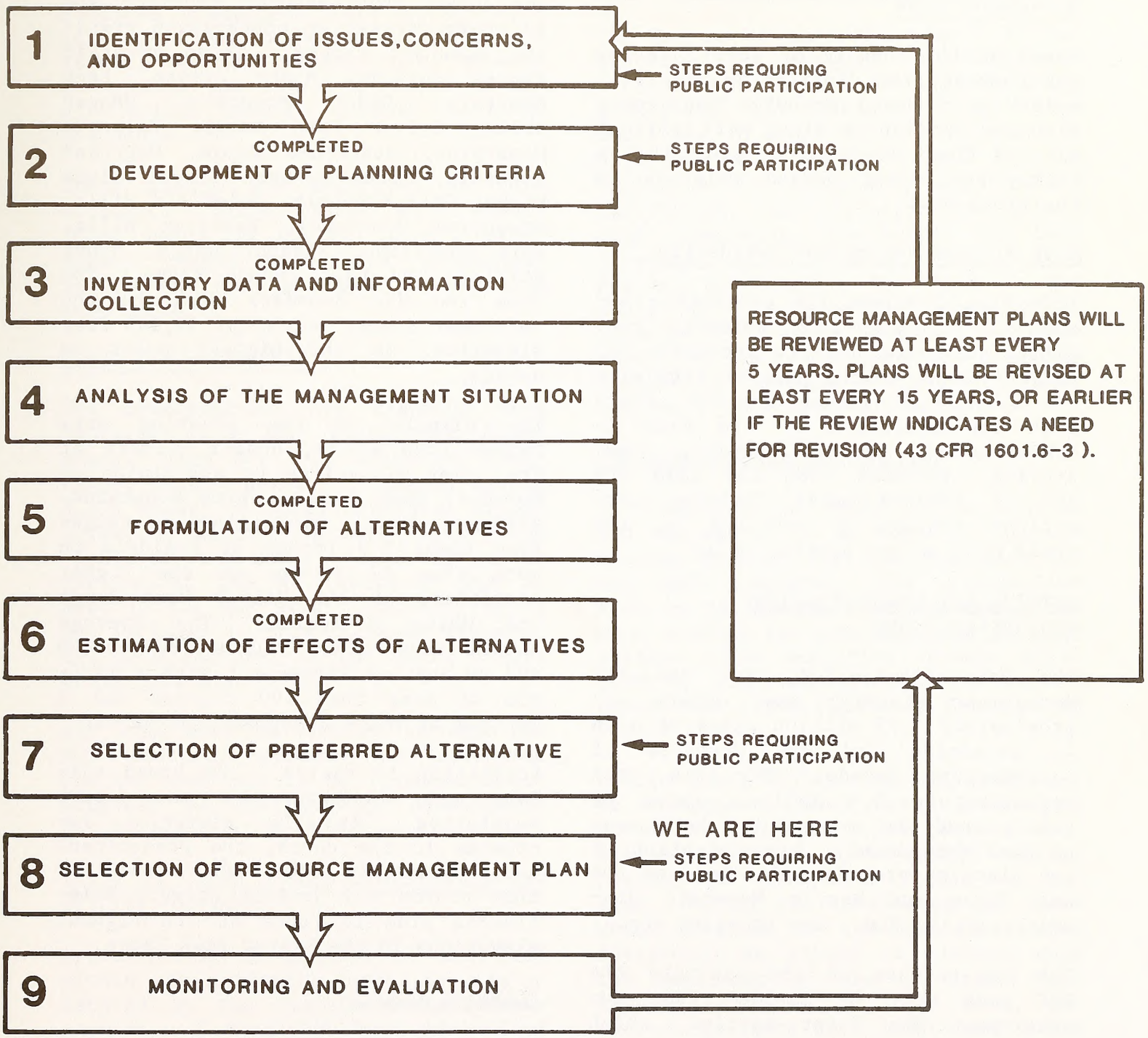

1 IDENTIFICATION OF ISSUES,CONCERNS, AND OPPORTUNITIES
STEPS REQUIRING PUBLIC PARTICIPATION
2 COMPLETED DEVELOPMENT OF PLANNING CRITERIA
STEPS REQUIRING PUBLIC PARTICIPATION
3 COMPLETED INVENTORY DATA AND INFORMATION COLLECTION
4 ANALYSIS OF THE MANAGEMENT SITUATION
5 COMPLETED FORMULATION OF ALTERNATIVES
6 COMPLETED ESTIMATION OF EFFECTS OF ALTERNATIVES
7 SELECTION OF PREFERRED ALTERNATIVE
STEPS REQUIRING PUBLIC PARTICIPATION
WE ARE HERE
8 SELECTION OF RESOURCE MANAGEMENT PLAN
STEPS REQUIRING PUBLIC PARTICIPATION
9 MONITORING AND EVALUATION
RESOURCE MANAGEMENT PLANS WILL BE REVIEWED AT LEAST EVERY 5 YEARS. PLANS WILL BE REVISED AT LEAST EVERY 15 YEARS, OR EARLIER IF THE REVIEW INDICATES A NEED FOR REVISION (43 CFR 1601.6-3).

FIGURE 1-1 Planning Process Overview

Step 8: Selection of the Resource Management Plan

Based on the results of public review and comment, the District Manager will select a proposed Resource Management Plan and publish it along with a final EIS. A final decision is made after a thirty-day appeal period relative to the final EIS.

Step 9: Monitoring and Evaluation

This step involves the collection and analysis of long-term resource condition and trend data to determine the effectiveness of the plan in resolving the identified issues and to assure that implementation of the plan is achieving the desired results. Monitoring continues from the time the RMP is adopted until changing conditions require a revision of the whole plan or any portion of it.

SETTING AND ADMINISTRATION RESPONSIBILITIES

The Esmeralda-Southern Nye Resource Management Planning Area covers approximately 3.75 million acres of land in Esmeralda and Nye Counties of southwestern Nevada. Of this area approximately 3.4 million acres of public land are managed by the Bureau of Land Management. Administration of the planning area is split between the Las Vegas and Battle Mountain districts of the BLM. See Location Map.

For the purpose of the analysis the RMP area will be divided into two sections. The first section, which includes all of Esmeralda County and that portion of Nye County west of the bombing range down to six miles south of Beatty, will be called Planning Area A. Area A consists of 2,787,224 acres and is administered by the Battle Mountain District. The second section includes the remainder of southern Nye County and will be called Planning Area B. Planning Area B consists of 969,534 acres and is administered by the Las Vegas District.

The RMP area is a part of the Basin and Range Physiographic Province and is characterized by north-south trending mountain ranges. These mountain ranges include: Monte Cristo, Lone Mountain, Cedar Mountain, Weepah Hills, Silver Peak Range, Palmetto Mountains, Montezuma Range, Magruder Mountain, Mount Jackson Ridge, Slate Ridge, Gold Mountain, Goldfield Hills, Grapevine Mountains, Bullfrog Hills, Bare Mountains, Spector Range, Mount Stirling and Last Chance Range. The area includes Boundary Peak in the northwest corner which, at 13,145 feet elevation, is the highest point in Nevada.

The climate of the planning area ranges from a dry, desert climate at the lower elevations to sub-alpine on Boundary Peak in the White Mountains. Average annual precipitation ranges from about 3.3 inches at Coaldale to more than 12 inches at the higher elevations of the Silver Peak Range and White Mountains. The average annual temperature ranges between 50 and 60 degrees Fahrenheit with a maximum of more than 100 degrees and a minimum of below 0 degrees Fahrenheit.

Vegetation is varied. The broad valleys are dominated by salt-desert vegetation. As the elevation increases in the north, the predominant large plant is the Joshua Tree and then pinyon and juniper trees. Bristlecone pine is found at the highest elevations in the Silver Peak Range.

PLANNING ISSUES

Issues drive RMPs and indicate specific concerns the BLM or the public may have regarding the planning area. An issue is defined as an opportunity, conflict, or problem regarding the management of public lands and associated resources.

Issue-driven planning means that only those aspects of current resource management felt to be a concern are examined by being carried through the formulation and analysis of alternatives. Alternatives are not

developed for those aspects of current resource management felt to be satisfactory. Although not identified as issues, off-road vehicle use, mineral management and areas of critical environmental concern (ACECs) will be discussed.

Three issues are addressed in this document. These issues were identified based on public input, interagency consultation, BLM management review and the judgement of planning team members.

ISSUE 1: WILDERNESS

The Esmeralda-So. Nye Planning Area contains five BLM Wilderness Study Areas. They are: 1) Grapevine Mountains, 66,800 acres; 2) Pigeon Spring 3,575 acres; 3) Queer Mountain, 81,550 acres, 4) Resting Springs, 3,850; and 5) Silver Peak Range, 33,900 acres. A portion of the Mt. Stirling WSA is also in the RMP area. However, it is not included in this document since it has been analyzed in the Clark County Wilderness EIS, 1983.

All WSAs must be studied through the BLM planning process to determine whether they are to be recommended to Congress as suitable or nonsuitable for designation as wilderness.

ISSUW 2: LAND TENURE ADJUSTMENTS AND UTILITY CORRIDORS

Approximately 91 percent of the land within the planning area is administered by the Bureau of Land Management. A need has been identified to make public land available for community expansion and development, agricultural development, utility corridors, and other public purposes. In addition, lands should be identified where ownership adjustments will achieve more efficient management and utilization of public resources or to make lands available for better uses.

ISSUE 3: RANGELAND MANAGEMENT

The Bureau of Land Management is responsible for managing rangeland vegetation. This responsibility includes protecting the integrity and productivity of the vegetative resource while making vegetation and habitat available for livestock, wild horses and burros, and wildlife. To effect this management, the Bureau has been directed, as a result of the 1973 Federal court suit, to write an EIS analyzing the potential impacts of alternative grazing programs. Integration of this EIS into the Resource Management Planning process will meet the court-ordered requirement.

OFF-ROAD VEHICLE DESIGNATION

Off-road vehicle (ORV) use allocation did not emerge as an issue during the scoping process for the Esmeralda-So. Nye RMP. However, ORV designation will be implemented through the planning process for the RMP area in compliance with Executive Orders 11644 (Use of Off-Road Vehicles on Public Lands) and 11989 (Off-Road Vehicles on Public Lands).

Public lands within the RMP area must be designated either open, limited or closed to ORV use. Two current management framework plans (MFPs) outline present ORV management within the RMP area. During the development of these MFPs, portions of the RMP areas were designated as closed or limited with the remainder of the RMP area designated as open. At that time, resource conflicts were identified and a multiple use analysis was performed. No problems have since been identified with the MFP decisions and therefore, no change is recommended. Because of this status, ORV designations were not considered an issue. ORV designations are detailed in Chapter 2 under the heading "Proposed Plan Management Guidance."

MINERALS

Mineral resource management was not included as an issue during the development of the Esmeralda-So. Nye RMP. Two current MFPs, in addition to the Esmeralda and Stateline Geothermal, Oil and Gas Environmental Assessments outlined present management guidance for the RMP area. This guidance has been reviewed and is considered to be current and adequate. During 1982 all mineral withdrawals and Classification and Multiple Use (CMU) segregated lands were reviewed to determine if a need still exists to justify the continuance of these withdrawal/segregations. A breakdown of current minerals management including the status of the withdrawals/segregations may be found on Table 2-1 of the draft RMP/EIS.

The only proposed management prescriptions that would affect mineral management would be those related to wilderness designation. In the case of wilderness designation, impacts to minerals are discussed as a part of the wilderness issue.

AREAS OF CRITICAL ENVIRONMENTAL CONCERNS (ACECs)

ACECs were not identified as an issue during the scoping process for the Esmeralda-So. Nye RMP. At the present time there are no designated ACECs within the RMP area. Lands within the RMP area were reviewed by the BLM during the development of the plan. Two potential ACECs were identified during the review. They were the Ash Meadows area and Big Dune. Both of these areas provide habitat for proposed and/or listed threatened and/or endangered species. The designation of these potential ACECs was not analyzed in the draft RMP/EIS document since current management options now available to the BLM are adequate for the protection of any special resources found in the RMP area. In the case of Big Dune, the BLM has entered into a Conservation Agreement with the U.S. Fish and Wildlife Service (FWS) for its protection. In Ash Meadows, a habitat management plan (HMP) has been partially implemented. This HMP will continue to be implemented and will be modified to include new data pertaining to threatened or endangered species. In addition the U. S. Fish and Wildlife Service is developing a wildlife refuge in Ash Meadows. Implementation of the FWS's Land Protection Plan for Ash Meadows would protect these species.

SEQUENCE OF PLAN IMPLEMENTATION ACTIONS

The selection of this final resource management plan was subsequent to a review of the public comments submitted in response to the draft plan. This proposed plan consists of a combination of several of the alternatives present in the draft RMP. After publication of this final environmental impact statement, management decisions will be documented in a record of decision published in the Federal Register.

The proposed resource management plan will be implemented through activity plans such as allotment management plans (AMPs), wildlife habitat management plans (HMPs) and wild horse herd management area plans (HMAPs). These plans will identify such details as the grazing system to be used in an allotment management plan and the location of range improvements for the benefit of livestock, wild horses and wildlife. The management actions developed for these plans will be integrated into a total management program designed to assure progress towards meeting the objectives of the resource management plan. Additional implementation guidelines that apply to the alternatives are discussed below.

Implementation of the resource management plan will take place through coordination, consultation, and cooperation. The preferred method

will be coordinated resource management and planning (CRMP). CRMP is an advisory process that brings together all interests concerned with the management of resources in a given local area (landowners, land management agencies, wildlife groups, wild horse groups, and conservation organizations) and is the recommended public process through which consultation and coordination will take place.

PLAN MONITORING

The resource management plan will be evaluated at five-year intervals to determine if there is sufficient cause to warrant revision or admendment.

This evaluation will focus on the objectives and management prescriptions developed for the issues analyzed. The general purposes of this monitoring and evaluation will be:

To determine if a prescription is fulfilling the purpose and need for which it was designed, or if there is a need for modification or termination of the action.

To discover unanticipated and/or unpredictable effects.

To ensure that decisions are being implemented on schedule.

To provide continuing evaluation of consistency with state and local plans and programs as well as adjoining BLM or other Federal agency plans.

CHAPTER 2

PROPOSED RESOURCE MANAGEMENT PLAN

Chapter 2

PROPOSED RESOURCE MANAGEMENT PLAN

THE PROPOSED RESOURCE MANAGEMENT PLAN

The proposed plan strives to balance competing demands by providing for production of needed goods and services, while protecting important environmental values. This alternative would change present management to the extent necessary to meet statutory requirements, policy commitments and to resolve identified issues in a balanced, cost-effective manner.

The Proposed Plan and the Preferred Alternative are essentially the same with one exception. As a result of consultation and review with the Nevada Department of Wildlife (NDOW) the Emigrant Peak Allotment has been closed to livestock grazing. This allotment has not been grazed for more than five years, and its closure would be consistant with actions outlined in an existing Silver Peak Habitat Management Plan jointly agreed upon by NDOW and BLM.

ISSUE I: WILDERNESS

Objectives

To recommend wilderness designation for those wilderness study areas (WSAs) where the values of wilderness designation are capable of balancing the other resource values and uses which would be foregone due to wilderness designation. All areas recommended suitable for wilderness designation must be able to be managed as wilderness over the long term.

Management Prescriptions

Under the Proposed Plan 17,850 acres or nine percent of the WSAs are recommended as suitable and 173,009 acres are recommended as nonsuitable for wilderness designation. See Table 2-1 for a breakdown of wilderness acreage recommendations by wilderness study area (see Wilderness Recommendation Map).

Grapevine Mountains: The entire 66,800 acres within this WSA are recommended as nonsuitable for wilderness designation. The southern one-third of the mountainous portion of the WSA has a moderate potential for metallic minerals, and the entire WSA has a moderate potential for geothermal resources. The area contains only moderate wilderness values, supported primarily by outstanding opportunities for solitude. Motorized vehicle access across the gentle valley terrain of the WSA would adversely affect the BLM's ability to manage the area as wilderness over the long term.

Pigeon Spring: The entire 3,575 acres within this WSA are recommended as nonsuitable for wilderness designation. This WSA is contiguous to the California Desert Conservation Area, Sylvania Mountains WSA, No. 111, totalling 14,983 acres, which was recommended as nonsuitable for wilderness designation. Therefore, the Pigeon Spring WSA is not recommended as suitable for wilderness designation due to its small size and lack of wilderness characteristics when judged on its own merits.

Queer Mountain: The entire 81,550 acres within this WSA are recommended as nonsuitable for wilderness designation. The northwest, northeast and southeast portions of the WSA have a moderate potential for metallic minerals. The entire WSA also has a moderate potential for geothermal resources. The area contains only moderate wilderness values, supported primarily by outstanding opportunities for solitude. Management of the entire area as wilderness over the

long-term cannot be assured due to the potential for development of valid mining claims in the northern portion of the WSA and the ease of motorized vehicle access throughout most of the WSA.

Resting Spring Range: The entire 3,850 acres within this WSA are recommended as nonsuitable for wilderness designation. This WSA is contiguous to the California Desert Conservation Area, Resting Spring Range WSA, No. 145, totalling 89,772 acres, which was recommended as nonsuitable for wilderness designation. Therefore, the Resting Spring Range WSA is not recommended as suitable for wilderness designation due to its small size and lack of wilderness characteristics when judged on its own merits.

Silver Peak Range: A central core area, totalling 17,850 acres, which possesses high wilderness values is recommended as suitable for wilderness designation. This core area includes Icehouse Canyon, Piper Peak, and the ridgeline running north of Piper Peak. The area's high wilderness values result from the outstanding op- portunities for primitive recreation and solitude and the presence of special features, such as bighorn sheep and wild horses. The addition of 1,184 acres of public land at the mouth of Icehouse Canyon along the northwest boundary of the WSA improves the management situation of the area by establishing an easily recognizable boundary based on topography. The remaining 17,234 acres of the WSA are recommended as nonsuitable for wilderness designation due to the moderate and high potential for metallic minerals and geothermal resources as well as to avoid potential conflicts with mining claims along the periphery of the WSA.

ISSUE 2: LAND TENURE AND UTILITY CORRIDORS

Objectives

To improve opportunities for economic development by substantially increasing the amount of non-federally owned land within the RMP area.

To improve the manageability of public lands by disposing of scattered isolated tracts of land and creating a blocked-ownership pattern.

To ensure a system for transmission of utilities through the RMP area by establishing corridors which will meet the long-range planning needs of utility companies and avoid sensitive resource values.

Management Prescriptions

Identify a pool of 94,949 acres of public land for disposal during the life of this plan (See Land Disposal and Corridor-Proposed Plan Map). This land would meet urban-suburban expansion or agricultural development needs for communities in the RMP area. Disposal of identified public lands would also enhance BLM management of residual lands, by creating a blocked-ownership pattern in the RMP area (see Table 2-2 for land disposal acreage).

Designate 357 miles of utility corridors which include existing facilities and/or rights-of-way and identify 30 miles of planning corridors (see Land Disposal and Corridors-Proposed Plan). No private land would be included in these corridors.

1. A-B-C-D-E-F-G-H-I, a designated corridor running north-south which includes a right-of-way held by Western Area Power Administration (WAPA) for a 750 KV D.C. line.

2. B-O-N and O-M, a designated corridor running east-west. This corridor provides the only major east-west route in the planning area and would provide an outlet for potential geothermal power which may be produced in Fish Lake Valley.

3. P-B, a planning corridor running east-west which provides for the logical extension of corridor B-O-N and O-M. It would serve the same purpose as the aforementioned corridor.

4. L-W-O, a designated corridor running east-west containing an existing facility. It serves as the major link between the Millers and Fort Churchill substations.

5. X-S-D, E-K-G and H-J, designated corridors running north-south along U. S. 95 that contain existing facilities not included in the WAPA right-of-way corridor.

6. Z-Y, a planning corridor running north-south from Ione Valley and providing a route from Austin, NV.

7. M-R, a designated corridor generally running north-south between Tonopah and Alkali substations.

ISSUES: RANGELAND MANAGEMENT

Objectives

Improve the condition of public rangelands to enhance the productivity for all rangeland values.

Initially, authorize livestock use at existing levels.

Initially, manage wild horses and burros and their habitat at current numbers in areas which constituted their habitat at the time the Wild and Free-Roaming Horse and Burro Act became law in 1971.

Initially, manage wildlife habitat for existing numbers of big game, while recognizing reasonable numbers as a management goal.

To maintain or improve selected riparian and stream habitat to good or better condition.

Management Prescriptions

Authorize livestock use up to active grazing preference. However, this is estiminated not to exceed the three to five year average of 46,013 animal unit months (AUMs). The Emigrant Peak allotment will be closed to livestock grazing. Section 7 consultation will take place with the U.S. Fish and Wildlife Service before issuing an ephemeral permit on the Carson Slough and Grapevine-Rock Valley allotments. The Ash Meadows grazing lease will be closed to livestock grazing.

Livestock grazing on all ephemeral allotments would only be allowed if on-the-ground evaluations determine that forage is available and that it can be grazed without detriment to riparian vegetation.

Intensively manage six Improve category allotments and provide three Maintain category allotments with range improvements (see Draft-Table 2-4 for intensive management implementation priorities) (see Draft-Allotment Boundary Map). These actions would improve vegetative condition and livestock distribution. Other range improvements may be implemented if private funds are made available.

Construct or implement range improvement projects in support of intensive management (see Draft-Table 2-5 for specific range improvements and their costs).

Manage wild horses and burros at current numbers based on the 1982 survey which identified a level of 1127 and 357 head respectively in 13 herd areas (See Draft-Table 2-6).

Develop six springs to enhance management of four herd areas (see Draft-Table 2-7). Implement Herd Management Area Plans following the priorities listed in Draft Table 2-7.

Continue existing rangeland monitoring studies, and establish new studies as recommended by the 1981 Nevada Range Monitoring Procedures. The studies are to determine if management objectives are being reached and what adjustments in livestock use, wild horse and burro numbers and wildlife numbers are necessary.

Manage current wildlife habitat initially for current numbers with a goal of achieving reasonable numbers in both current and historical habitat (see Draft-Table 2-8 for specific projects and habitat management plan priorities).

Continue the implementation of the Ash Meadows and Silver Peak Habitat Management Plans (HMPs). The Ash Meadows HMP will be modified to include new data pertaining to sensitive, threatened or endangered species. The BLM, in consultation/cooperation with Nye County, will work toward achieving the objectives outlined in the U.S. Fish and Wildlife Service's Ash Meadows Land Protection Plan.

Support reintroduction of bighorn sheep into historic habitat areas in the Goldfield, Amargosa, Magruder/ Palmetto, Monte Cristo, Montezuma, Silver Peak and Sawtooth habitat areas.

Support introduction of bighorn sheep into suitable habitat in the Bare Mountain and Gold Mountain habitat area.

Support augmentation of elk in current habitat in the Spring Mountains habitat area.

Implement special management treatments and/or facilities along 4.8 miles of streams to improve aquatic and riparian habitat condition.

PROPOSED PLAN MANAGEMENT GUIDANCE

The following management guidance is applicable to all resources or uses specifically discussed as an issue in the Proposed Plan or present in the RMP area. This guidance consists of current management practices expected to continue which include decisions outlined in the Esmeralda and Stateline MFPs, plan implementation actions and standard operating procedures. All guidance applies to both Planning Areas A and B except where noted.

SOIL WATER, AND AIR PROGRAM

General

Soil, water and air resources will continue to be evaluated on a case-by-case basis as a part of project level planning. Such evaluation will consider the significance of the proposed project and the sensitivity of soil, water and air resources in the affected area. Stipulations will be attached as appropriate to ensure compatibility of projects with soil, water, and air resource management.

Soil

Soils will be managed to maintain or improve rangeland productivity as well as minimizing present and potential wind and water erosion.

Water

Water quality will be maintained or improved in accordance with state and Federal standards, including consultation with state agencies on proposed projects that may significantly affect water quality. Management actions on public land within municipal watersheds will be designed to protect water quality and quantity.

Management activities in riparian zones will be designed to maintain or, where possible, improve riparian habitat condition.

Roads and utility corridors will avoid riparian zones to the extent practicable.

Air

Air quality will be protected as all BLM and BLM authorized activities must prevent air quality deterioration beyond the established standards specified in the Nevada Ambient Air Quality Standards. The Federal Land Policy and Management Act of 1976 (FLPMA) specifies the protection of air and atmospheric quality on BLM lands in Sec. 102(a)(8), and compliance with state and Federal laws in Sec. 202 (c)(8). FLPMA also requires an active role in preventing air quality violations on BLM lands in Sec. 102(c)(8). The Clean Air Act of 1977 has specific requirements for Federal land managers to protect the air over lands under their jurisdiction.

LANDS PROGRAM

Land Tenure

All land disposal actions are discretionary. Land disposals may be accomplished through one of the following methods; sales, Recreation and Public Purposes Act requests, exchanges, or agricultural entry. Disposal of these parcels will be made on an as-needed basis, with perimeters established in coordination with the appropriate government entity and will be accomplished by the most appropriate disposal authority.

Site-specific decisions regarding land ownership adjustments in the planning area will be made based largely on consideration of the following criteria through the land report/environmental analysis process. In addition, all lands identified for disposal must meet one or more of the criteria outlined in section 203(a) of FLPMA. This criteria list is not considered all-inclusive, but represents the major factors to be evaluated.

1) Public resource values or concerns, including but not limited to: threatened, endangered or sensitive species habitat;
riparian areas;
flood plains and wetlands;
fisheries;
nesting/breeding habitat for game birds or animals;
key big game seasonal habitat;
wild horse and burro habitat;
developed recreation and recreation access sites;
municipal watersheds;
energy and mineral potential;
visual resources;
cultural resource sites eligible for inclusion on the National Register of Historic Places;
wilderness and areas being studied for wilderness; and, other statutory-authorized designations.

2) Accessibility of the land for public uses.

3) Amount of public investments in facilities or improvements (i.e., range improvements, wildlife projects, etc.) and the potential for recovering those investments.

4) Difficulty or cost of administration (manageability).

5) Significance of the decision in stabilizing business, social and economic conditions, and/or lifestyles.

6) Encumbrances or conflicts of record; consistency of the decision with cooperative agreements and plans or policies of other agencies.

7) Suitability and need for change in land ownership or use for purposes including but not limited to community expansion or economic development, such as industrial, residential, or agricultural (other than grazing) development.

Utility Corridors

Utility corridors, either designated or planned, will be identified following BLM procedures and will be made on a point-to-point basis. The actual route will be established after environmental analysis is completed on each rights-of-way application. Designated corridors will be three miles wide and planning corridors will be five miles wide except where topographic constraints exist.

Designated corridors are those which contain existing transmission facilities and/or rights-of-way. Planning corridors will be identified where there are no existing transmission facilities and/or rights-of-way. Where transmission facilities and/or rights-of-way exist, the width of the corridor will encompass the existing right-of-way and be located to avoid sensitive resources. Future rights-of-way applications will be required to locate new facilities in proximity to existing facilities except where considerations of construction feasibility, cost, resource protection or safety are overriding.

VISUAL RESOURCES

Visual resources will continue to be evaluated as a part of the environmental analysis process for activity and project plans and other proposed actions. Such evaluation will consider the significance of the proposed project and the visual sensitivity of the affected area. Stipulations will be attached as appropriate to assure that the visual integrity of the area remains intact and that visual resource management objectives are met.

CULTURAL RESOURCES

Cultural resource protection is required through compliance with Section 106 of the National Historic Preservation Act of 1966, Section 2(b) of Executive Order 11593, and Section 101(b)(4) of the National Environmental Policy Act (NEPA) of 1969. Prior to project approval, intensive field (Class III) inventories will be conducted in specific areas that would be impacted by implementing activities. If cultural or paleontological sites are found, every effort will be made to avoid adverse impacts. However, in the case of National Register quality sites where avoidance of adverse impacts is not possible, BLM will consult with the State Historic Preservation Officer and the Advisory Council on the Historic Preservation in accordance with the Programmatic Memorandum of Agreement between the BLM and the Council dated January 14, 1980. This agreement sets forth a procedure for developing appropriate mitigative measures to lessen the impact of adverse effects. Finally, the American Indian Religious Freedom Act of 1978 (92 Stat. 469 or PL 95-341) defines the special status for sacred places, artifacts, plants, and animals of Native American peoples in the United States. This law guarantees American Indians access to sacred sites, including cemetaries, required in their religion, and natural species and resources, even though these resources may no longer be controlled by the Indian People.

WILDERNESS RESOURCES

All wilderness study areas will continue to be protected under the Bureau's Interim Management Policy and Guidelines for Lands Under Wilderness Review. Wilderness recommendations made in the final environmental impact statement for the resource management plan are preliminary and subject to change during administrative review. A separate legislative final environmental impact statement will be prepared for the wilderness study recommendations. A wilderness study report will also be written that addresses each area individually. The Director of the Bureau of Land Management will request mineral surveys by the United States Geological Survey and Bureau of Mines for each area recommended as preliminarily suitable. The Federal

Land Policy and Management Act of 1976 requires the Secretary of the Interior to review areas of the public lands determined to have wilderness characteristics, and to report to the President by October 21, 1991, his recommendations as to the suitability or nonsuitability of each such area for preservation as wilderness. The President is required to report his recommendations to Congress by October 21, 1993.

Designated wilderness areas would be closed to off-road vehicle use unless it takes place as part of a valid existing right or is authorized in the wilderness management plan. Separate management plans tailored to the characteristics of each area would be developed through consultation with interested parties. They would be coordinated with other activity plans for their areas. Specific management objectives, requirements, and decisions implementing administrative practices and visitor activities would be developed in each plan.

Designated wilderness areas would be segregated against appropriation and operations under the mining laws, mineral leasing laws, and other mineral disposal authorities subject to valid existing rights. Designation would allow for continuation of livestock grazing permits.

FOREST RESOURCES

Non-commercial harvesting of Christmas trees, juniper posts, pinyon nuts and dead or downed firewood will continue throughout the planning area except within the WSAs. In addition, two greenwood cutting areas and one Joshua Tree Harvest Area were established in Planning Area A in March of 1984. The two greenwood areas were established in the Palmetto Mountains and Silver Peak Range and the Joshua Harvest Area is located in the Magruder Mountain area. Special stipulations are attached to all permits issued for these two areas to accomplish protection of forest and other resources and fire protection.

RECREATION

General

Recreational activities within the RMP area include but are not limited to big and small game hunting, ORV use, rockhounding, fishing, waterfowl hunting, camping, and sightseeing for historical, scenic, geological, and zoological values. The area will continue to be managed to promote these activities.

Off-Road Vehicle Management

Off-road vehicles are currently managed in accordance with decisions outlined in the two current MFPs, as amended by the Frontier 500 Environmental Assessment completed in August of 1982 and in accordance with a Conservation Agreement between the BLM and FWS addressing the Giuliani's Dune Scarab Beetle. The following restrictions have been identified and/or analyzed in the aforementioned documents:

Closed

Planning Area A

Pinyon-Joshua Tree Transition Research Natural Area, 10 acres.

Planning Area B

Big Dune, 5 acres.

Limited

Planning Area A

Goldfield Joshua Tree Forest, 100,000 acres (competitive events limited to existing roads, trails, and washes)

Pinyon-Joshua Tree Transition Research Natural Area, 630 acres (closed to competitive events, and other vehicles are restricted to existing roads, trails and washes).

The Sump, 160 acres (closed to competitive events, and other vehicles are restricted to existing roads, trails and washes).

Amargosa speckled dace and Amargosa toad habitat, 55 acres (competitive events limited to existing roads, trails and washes).

Planning Area B

Ash Meadows Pup Fish Area, 13,000 acres (closed to competitive events, and other vehicles are restricted to existing roads, trails, and washes).

Big Dune, 126 acres (closed to competitive events).

Open

The remainder of the area will be designated as open. Applications for commercial or competitive special recreation use permits in areas designated as open will be analyzed through the special recreation use permit/ environmental assessment process to determine what impacts may occur. These potential impacts will then be weighed against resource values to determine whether or not the special recreation use permits will be authorized.

RANGE MANAGEMENT

Selective Management

It is the policy of the BLM to address rangeland management problems through a selective management approach. The BLM has developed three categories into which allotments will be grouped according to their resource needs and potential for improvement. The names and objectives of the three categories are: 1) (M) maintain the current satisfactory condition; 2) (I) improve the current unsatisfactory condition; and 3) (C) manage in a custodial fashion.

The implementation of intensive grazing management will be accomplished through livestock grazing allotment management plans (AMPs). Allotments in the "improve" category are given first priority for development of plans to resolve identified problems. Second priority for livestock grazing AMP development is given to "maintain" category allotments and third priority is assigned to "custodial" category allotments. Although range improvements are not proposed on third priority allotments in this RMP, some minor rangeland improvements may be developed as the need arises, or if private funds become available.

The potential for improvement of each allotment has been determined by estimating its present range condition and analyzing its resource potential, presence of user conflicts, opportunity for positive economic return, and present management. A complete listing of the specific criteria used to evaluate the RMP area's grazing allotments appears in Appendix B, Table 1.

The initial allotment categorizations shown in Draft Appendix B, Table 2, are sub- ject to change. Allotments may be placed into different categories in the future as allotment evaluations show changed conditions.

Allotment Management Plans

Resource opportunities, problems and/ or conflicts have been identified for each allotment. In addition, resource management objectives for each allotment have been developed by focusing on these identified opportunities, problems, and/or conflicts (see Draft

Appendix C). Future management prescriptions, including approval of allotment management plans (AMPs) will be tailored to meet these objectives. These plans will be multiple-use in nature and coordinated with wildlife (HMPs) and wild horse plans (HMAPs). Key components of AMPs are management objectives, grazing systems, range improvements and monitoring studies.

Grazing Treatments and Systems

Grazing treatments are the building blocks of a grazing system, and are designed to improve rangeland condition by manipulating livestock grazing to accomplish the objectives of management. The deferment of grazing or complete rest from grazing during the critical growth period of key management species allows these species to maintain and/or increase their density, percent composition, vigor, production and reproduction. Where intensive grazing management systems are implemented, utilization levels may be exceeded during each grazing cycle. The periodic rest from grazing would allow the key management species to increase in vigor and production.

Movement of livestock in I allotments without interior pasture fences would be controlled by manipulating water sources. This would be done in a manner which achieves the grazing use prescribed in the following treatments. For I allotments with interior fencing, each pasture would receive these treatments.

Treatment 1

Graze livestock yearlong or seasonlong for livestock production.

Treatment 2

Rest from livestock grazing one year or grazing season to provide for vigor of key management species.

Treatment 3

Defer livestock grazing until after seedripe of key management species to promote reproduction.

Livestock Use Adjustments

Livestock use adjustments are most often made by changing one or more of the following: the class of livestock grazing an allotment, the season of use, the stocking rate, or the pattern of grazing. All livestock use adjustments will be implemented through documented mutual agreement or by decision. When adjustments are made through mutual agreement, they may be implemented once the rangeland program summary has been through a public review period. When livestock use adjustments are implemented by decision, the decision will be based on operator consultation, range survey data, and monitoring of resource conditions. Current BLM policy emphasizes the use of a systematic monitoring program to identify the need for livestock adjustments.

Monitoring will also be used to measure the changes brought about by new livestock management practices and to evaluate the effectivess of management changes in meeting stated objectives.

Range Improvements

Range improvements will be implemented to achieve specific resource management objectives. Development of range improvement projects will include the following procedures:

Environmental analysis will be conducted during project planning so that, depending on impacts, modification or abandonment of the project may be decided.

Benefit/Cost (B/C) analysis will be performed on improvements required to implement new AMPs and other ac-

tivity plans subsequent to the EIS. Such improvements will be analyzed on an allotment basis. The B/C analysis will be performed in compliance with BLM policy.

Only the minimal clearing of vegetation will be allowed on project sites requiring excavation.
Alteration of sagebrush areas either through application of herbicides, prescribed burning, or by mechanical means will be in accordance with procedures specified in the Memorandum of Understanding between the Nevada Department of Wildlife and Bureau of Land Management relating to the Western States Sage Grouse Guidelines.

Active raptor nests adjacent to areas proposed for vegetation manipulation will be protected. On-the-ground work will be confined to the period preceding nesting activity or after the young have fledged (left the nest). Areas containing suitable nesting habitat will be inventoried for active raptor nests prior to initiation of any project.

Soils inventories will be completed prior to planning vegetation type conversions to determine land treatment feasibility.

Fire management plans will be developed before any prescribed burning occurs on any native vegetation.

Fence construction must comply with BLM Manual 1737 and NSO Manual Supplement 4730. Lay-down fences will be constructed in wildlife and wild horse areas if necessary and feasible. Fences in wild horse areas will contrast enough with surroundings so as to be visible to horses and will have gates installed at least once every mile and at all corners.

Spring sources will be fenced and water provided for livestock and/or wild horses and burros away from the source when a spring is developed. This will prevent overgrazing and trampling of adjacent vegetation and provide escape areas for small wildlife.

All disturbed areas would be rehabilitated where such action is necessary and practical, to replace ground cover and prevent erosion.
Maintenance of structural improvements shall be provided by the user deriving the primary benefit from the improvement, through cooperative agreements and as specified in the BLM's 1982 Rangeland Improvement Policy.

Water will be made available in allotments and rested pastures for wild horses and wildlife, wherever feasible.

Where the need is identified for wildlife use, water improvements will include bird ramps in watering troughs, drinkers along pipelines, overflows at troughs and protected seep areas.

Monitoring Program

The purpose of the program is to provide the BLM with reliable data to determine if livestock, wild horse, and wildlife management prescriptions are meeting resource management objectives. It incorporates approved methods contained in the 1981 Range Studies Task Group monitoring procedures (Range Studies Task Group, 1981), the draft Bureau Monitoring Studies Manual 4400 (USDI, BLM) which includes three technical reports outlining monitoring procedures and the Nevada Wildlife Manual Supplement 6630 and Fisheries Supplement 6670 (USDI, BLM).
Vegetation monitoring will include:

Utilization: BLM uses the Key Forage Plan Method -- an ocular estimate for judging utilization of key species by weight. In this method, the examiner divides noticeable utilization among six classes of use within a key management area; no use (0 percent), slight (1-20 percent), light (21-40 percent), moderate (41-60 percent), heavy (61-80 percent), and severe (81-100) percent). This method will be used in key areas. In addition, a map of utilization patterns will be developed for the entire allotment.

Actual Use: Livestock operators will provide records of actual livestock use. Use by wild horses will be determined through census figures with refinement based on actual season-of-use data as available. Actual use and season-of use by big game animals will be determined in cooperation with the Nevada Department of Wildlife.

Climatic Data: Annual precipitation and length of growing season have a marked influence on seasonal vegetation growth and production. Official weather stations, BLM and Nevada State climatic stations will provide the climatic data. This data will be used to correlate seasonal weather to plant growth throughout the RMP area as determined by the utilization and trend studies.

Condition and Trend: Condition of a range site is determined by comparing composition by air-dry weight of the present plant association with that of the site's potential plant community. Trend is the direction of change in condition of the range observed over time. Changes in trend are categorized as upward, downward, or not apparent. From three to five years of observation are needed before any trend can be detected on most range sites. Trend is measured by using several methods, primarily by noting changes in the frequency of key species in key areas over time, using the Quadrat Frequency Method. Additional monitoring will be conducted in crucial wildlife and wild horse areas. Information gained through these efforts and other studies will be used in making any grazing decision. For more detailed information on these monitoring procedures, refer to the 1981 Final Nevada Range Monitoring Procedures (Range Studies Task Group, 1981), BLM Technical References 4400-1, 2 and 3 and draft 4400-4 (USDI, BLM) and the Nevada Wildlife Manual Supplement 6630 (USDI, BLM, Aug. 1982).

The monitoring program for those allotments in the "maintain" and "custodial" categories will be of low intensity. For the "improve" category allotments, monitoring intensity will be variable, focusing on the effects of management prescriptions on objectives outlined in Appendix C of the draft and any other objectives developed through consultation and coordination with interested parties and AMP development.

WILDLIFE

The development of wildlife habitat improvement projects will be guided by wildlife habitat management plans (HMPs). The development of plans will be closely coordinated with livestock and wild horse plans and other resource plans to meet the objectives of both programs. Wildlife HMPs will address four major themes: management of crucial habitats to provide for threatened, endangered, or sensitive species where present; management of big game ranges to provide habitat for reasonable numbers of animals over the long term; improvement of riparian, wetland, and aquatic habitats; and, management of other habitats to meet needs of upland game and nongame animals.

Riparian and aquatic habitat improvement measures could include managing livestock through grazing systems consistent with maintaining riparian vegetation in optimum condition, pasture fencing, or fencing areas to exclude livestock and wild horses. Whether to use protective fencing, grazing systems, some other appropriate measure, or a combination of methods will be determined on an individual basis for each stream or riparian area.

WILD HORSES AND BURROS

Wild horse and burro management will be guided by herd management area plans (HMAPs). These plans will be developed through consultation and coordination with interested parties and would be coordinated with livestock and wildlife plans and other resource plans. They will focus on wild horse and burro management through determination of proper horse use levels, population management, habitat improvement such as the development of water sources, and population and habitat monitoring studies.

THREATENED, ENDANGERED AND SENSITIVE SPECIES

No activities will be permitted in habitat for threatened, endangered or sensitive species that would jeopardize the continued existence of such species. Whenever possible, management actions in habitat for threatened, endangered or sensitive species will be designed to benefit these species through habitat improvement. All project work will require a threatened, endangered, or sensitive species clearance before implementation. Consultation with the Fish and Wildlife Service per Section 7 of the Endangered Species Act is necessary if a threatened, endangered or proposed threatened or endangered species, or its habitat may be impacted. Other species considered sensitive but not under the protection of the Act are given special management consideration by Bureau policy. If adverse impacts to these other sensitive species are identified during project planning, the project will be modified to avoid these impacts.

MINERALS AND ENERGY

Minerals

All public land is open to mineral entry and development unless previously withdrawn. Mineral exploration and development on public land will be regulated under 43 CFR 3800 to prevent unnecessary and undue degradation of the land. Validity examinations may be requested under the following conditions:

Where a mineral patent application has been filed and a field examination is required to verify the validity of the claim(s);

When there is a conflict with a disposal application or where the statute authorizing the disposal requires clearance of any encumbrance.

All public land is open to geothermal, oil and gas leasing with no special stipulations except in bighorn sheep habitat areas. In these areas, lease applications are processed on a case-by-case basis to evaluate if there is a need for special stipulations.

In 1982 all mineral withdrawals and segregations in the RMP were reviewed to determine if they were still necessary for their intended purpose. See Draft Table 2-1 for a breakdown of existing withdrawals and Classification and Multiple Use (CMU) Act segregations and their status.

In summary, 99.86 percent of the RMP area is open to mineral entry and .14 percent is closed by either withdrawals or CMU segregations. Restrictions on geothermal, oil and gas leasing occur on 6 percent of the area with the remainder of the area open with no special stipulations.

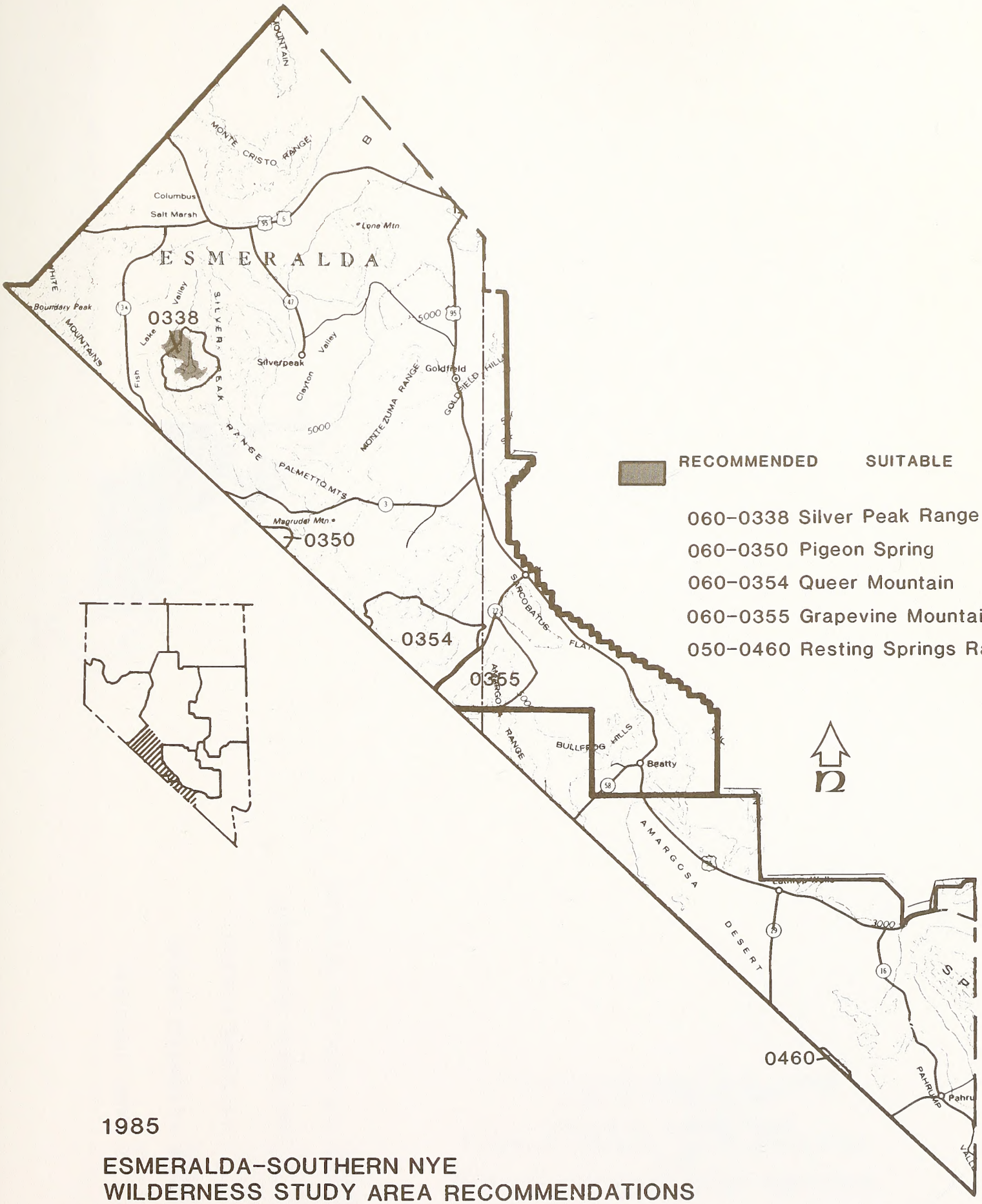
TABLE 2-1
ACREAGE RECOMMENDED SUITABLE FOR WILDERNESS DESIGNATION
IN THE PROPOSED PLAN

Wilderness Study Area	Suitable Acres	Nonsuitable Acres
Planning Area A		
Grapevine Mountains (NV-060-335)	0	66,800
Pigeon Spring (NV-060-350)	0	3,575
Queer Mountain (Nv-060-354)	0	81,550
Silver Peak Range (NV-060-338)	17,850a/	17,234
Subtotal	17,850a/	169,159
Planning Area B		
Resting Springs (NV-050-460)	0	3,850
Subtotal	0	3,850
Total	17,850a/	173,009

a/ Includes 1,184 acres added to enhance manageability.

TABLE 2-2
LAND DISPOSAL BY AREA

Area	County	Acres
Planning Area A		
Beatty	Nye	10,726
Blair Junction	Esmeralda	690
Coaldale	Esmeralda	530
Fish Lake Valley	Esmeralda	20,885
Goldfield	Esmeralda	2,674
Goldpoint	Esmeralda	1,540
Lida	Esmeralda	570
Millers	Esmeralda	2,720
Scottys Junction	Nye	3,660
Silverpeak	Esmeralda	1,080
Tonopah	Esmeralda	2,674
Subtotal		47,749
Planning Area B		
Amargosa	Nye	26,880
Lathrop Wells	Nye	5,240
Pahrump	Nye	15,080
Subtotal		47,200
Grand Total		94,949



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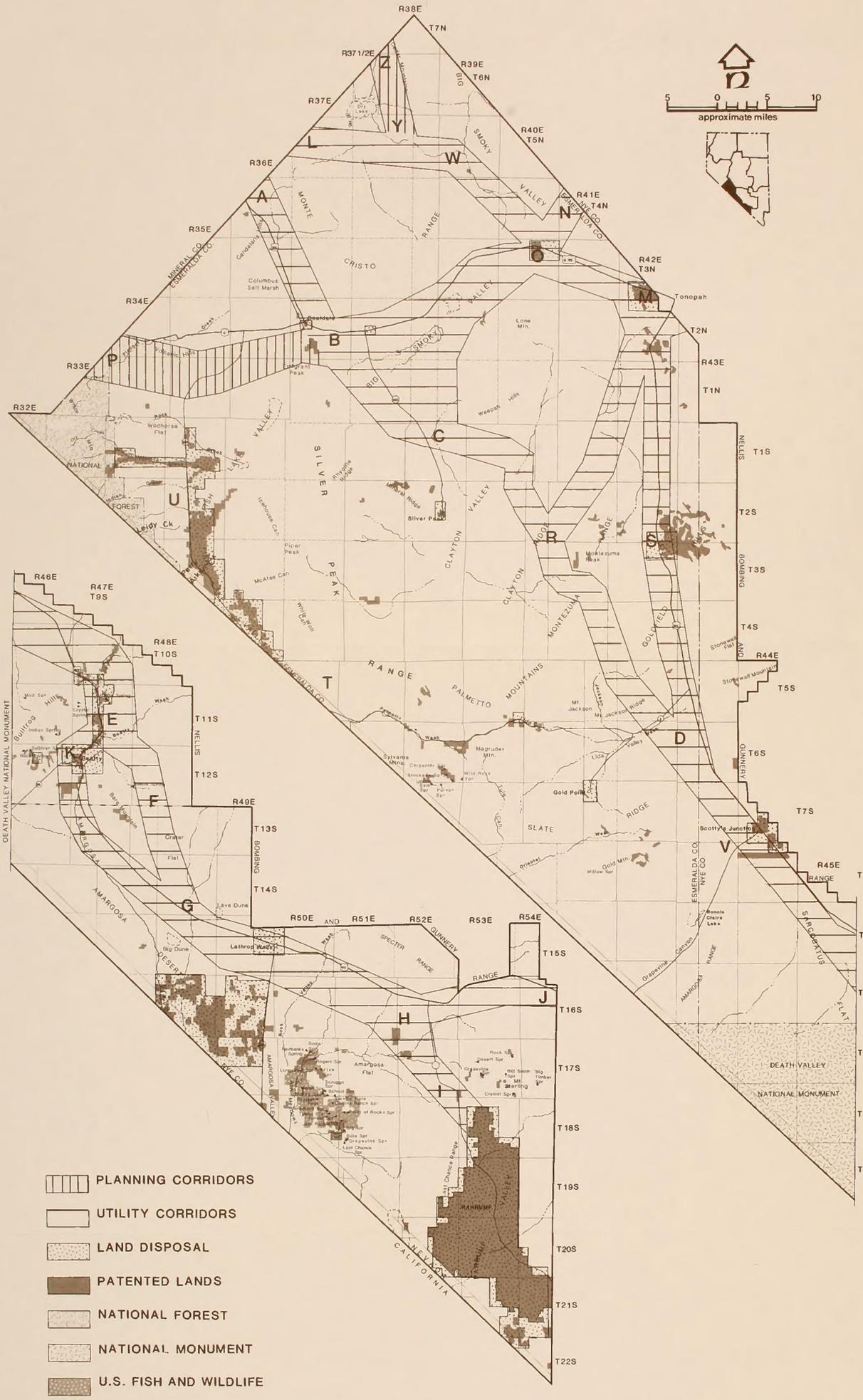
ESMERALDA-SOUTHERN NYE WILDERNESS STUDY AREA RECOMMENDATIONS



PROPOSED PLAN

Final Environmental Impact Statement
and
Proposed Resource Management Plan

ESMERALDA PLANNING AREA

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

1985

CHAPTER 3
REVISIONS AND ERRATA

Chapter 3

REVISIONS AND ERRATA

This chapter contains revisions and additions to the text of the draft RMP/EIS. It also contains errata of sections not reprinted in this final.

Paragraphs referred to in the draft RMP/EIS are numbered consecutively, beginning with the first paragraph of each page.

SUMMARY

National Forest lands identified on the Location Map and all subsequent maps should be changed from "Toiyabe National Forest" to "Inyo National Forest."

CHAPTER 2

Draft-Table 2-1 has been corrected and reprinted at the end of this chapter.

The figure on Table 2-5, page 33, second column total is changed from "1,443.185" to "1,443,185".

CHAPTER 3

The first sentence of the fifth paragraph on page 41 is changed to read "There is a constant attrition of these resources as surface disturbing activities relating to mining, ranching, farming and the like take their toll along with natural processes, such as erosion."

The second sentence of the seventh paragraph on page 57 is changed to read "These allotments include 1,858,554 acres or approximately 50 percent of the RMP area."

Period-of-use for the White Wolf allotment in Table 3-8 on page 58 is changed from 9/15-1/15; to 9/15-11/15, 3/15-to 6/15.

The last sentence of the fifth paragraph on page 62 is changed to read "No exploration has been documented in the WSA and there are no leases or application."

The last sentence of the seventh paragraph on page 63 is changed to read "No exploration has been documented in the WSA and there are no leases or applications."

The ninth paragraph on page 65 is changed to read "The State of Nevada is undrerepresented in the NWPS with only one designated area, the Jarbidge Wilderness, on the Idaho border."

The fifth paragraph of page 76 has been deleted from the draft.

The "Metallic Minerals" subsection on page 61 and "Silver Peak Range" subsection on page 64 has been revised as follows based on additional data received from the Nevada Bureau of Mines, Nevada Department of Minerals and public comment and input.

METALLIC MINERALS

Antimony, copper, gold, iron, lead, lithium, mercury, molybdenum, silver, tungsten and zinc have been produced commercially in the RMP area. Gold by far has been the most important product, with more than 70 percent of the recorded production coming from the Goldfield District.

The Goldfield deposits, which have yielded about 4,200,000 ounces, are irregular bodies in silicified, alunitized Tertiary dacite and andesite. A narrow zone about three-fourths of a mile long and dipping gently east contains the principal deposits.

The gold ore of the Silver Peak district consists chiefly of lenticular auriferous quartz veins

that replace rather highly folded moderately metamorphosed sedimentary beds of the Wyman Formation. The gold is usually finely dissenminated and in a free state although it is also contained in scattered pyrite and rare galena. Values are not regular. The quartz veins thicken or wedge out irregularly on strike. The Silver Peak district has yielded more than half a million ounces of gold.

Esmeralda County has produced approximately 12.5 million ounces of silver from the same 15 mining districts that have yielded the gold. The leading producing area has been the Silver Peak district (including Mineral Ridge and the Red Mountain areas) with more than 5 million ounces, followed in descending order by the Divide, Goldfield, Tonopah (within Esmeralda County lines), Lone Mountain (including Weepah), Hornsilver, Klondyke, Lida, and Montezuma districts. The Cuprite, Dyer, Gilbert, Palmetto, Sylvania, and Tokop districts have been relatively minor producers.

SILVER PEAK RANGE

Pre-Cambrian Paleozoic basement rocks are exposed along the northern and southern margins of the WSA and smaller exposures of the rocks are also found near the western edge of the WSA. Intruding the older sediments are Mesozoic plutons and smaller bodies of pegmatites as well as aplite and latite dikes. Mineralization associated with these intursives has been identified to the northeast in the Mineral Ridge district and to the west in the Dyer district.

The central highland of the Silver Peak Range lies between the areas of basement rock and consists of late Pliocene tuffs and flows that originated from the Silver Peak Caldera. The caldera has its center about 3 to 4 miles northeast of Piper Peak and is about 4 by 8 miles across. Early caldera erruptions produced rhyolitic to andesitic lava flows interbedded with airfall tuffs and waterlaid sediments. Later subsidence produced northeast striking, high-angle faults that became mineralized during the later stages of the caldera cycle, (Keith, 1977). Fluids released after volcanism ceased deposited the silver-bearing quartz veins of the Red Mountain district, and there are indications that similar mineralization is very close to the WSA or even within it.

Previous mineral productions has come mainly from the Mineral Ridge and Red Mountain districts, immediately northeast of the WSA. The Mineral Ridge district produced about $13 million in gold during the 1860s, 1870s and 1930s which would be worth about $200 million at modern prices. The Red Mountain district produced about $3 million in the late 1930s which would be worth about $30 million at modern prices. There are records of three major productive mines in the area: the 16-to-1, the Mohawk and the Nivloc. Several other small mines and prospects exists in the area as well. The 16-to-1 mine, currently operating, has reserves of 1.1 million tons grading at 0.035 ounces gold/ton and eight ounces silver/ton according to published reports. The Mohawk mine has seven targets possibly containing 150,000 tons of ore, according to Veta Grande. The Nivloc mine produced nearly $4 million in silver between 1937 and 1943. The Dyer district, on the western edge of the WSA, has produced $13,000 mainly in silver, (Nevada Department of Minerals, testimony submitted during public comment period).

The geochemistry of the Dyer district shows a distinct base-metal, precious-metal mineralization associated with quartz veins along NW structures. Elements of the same mineralization, especially lead and mercury, are associated with similar rocks and structures and can be extended along the entire western side of the WSA.

A second very distinct mineral association between tungsten and skarn deposits can be made for the same area. The proximity of the older sediments to granitic rocks is apparent; the location of tungsten mineralization is not apparent. The tungsten anomalies extend for over five miles down the western side of the range and involve five major drainages. The unknown source or sources of tungsten are from the east in the direction of the WSA.

Six different drainage systems along the same (western) side of the range are anomalous in mercury, one drainage hosts a known mercury deposit. Some anomalous drainages originate far to the east, well within the WSA and near the western boundary of the Silver Peak caldera. The presence of anomalous mercury in these drainages could very well indicate the presence of undiscovered precious metal deposits somewhere in the area served by the drainage system.

The correlation between the geochemistry and mineralization of the precious-metal deposits of the Red Mountain district and their relationship to the Silver Peak caldera has been made. Sunshine Mining Company, who operates the 16 to 1 Mine just east of the WSA, has submitted geochemical, mapping and modeling data which support the caldera model as well as other geologic indicators which show strong NE-SW trending structures which hold economic mineralization present in the Red Mountain District and that these structures may extend into the Silver Peak Range WSA, (Sunshine Mining Company, letter of February 15, 1985 comment letter #51). These structures are parallel to mineralized NE-trending structures outside of the WSA, and they have geochemical anomalies associated with them that are similar to the mineralization in the Red Mountain deposits.

The only localized area within the WSA without apparent mineralization exposed at surface or revealed by samples from drainages which cut it is in the southeastern quarter especially along the eastern end of McAfee Canyon. This area is covered by a thick layer of air-fall and ash flow tuffs that have no apparent mineralization.

Comments received during the draft RMP/EIS comment period from Inspiration Mines Inc. operator of the Sanger Mine located within the Red Mountain District, indicate mineralized veins aligned northeast-southwest along local faults which trend for roughly eight miles crossing the southeast side of the WSA. Because of this, there may be good chances of finding additional ore deposits within the WSA. However, the Nevada Bureau of Mines Geochemical Report indicated that a lack of mineralization in this portion of the WSA and therefore gave it a low favorability for metallic minerals.

Patented claims in the vicinity are all in the Mineral Ridge and Red Mountain Districts, well to the east of the WSA. There are a great many unpatented claims outside the WSA most of which are in the two mining districts. Two large blocks of claims are located adjacent to the WSA in altered rocks which may be an extension of the Red Mountain

District. One block claimed by the Sunshine Mining Co. is located near the east boundary in the vicinity of Mud Spring. The other block is adjacent to the north boundary. Within the WSA itself, there are 186 acres of claims of which 62 acres are pre-FLPMA.

Three and one-half percent of the WSA is classified as highly favorable for metallic minerals and is located along the eastern boundary. Seventy-four percent of the WSA is classified as having a moderate favorability for minerals. Bracketed by producing mines and prospects, the WSA stands out as an area with potential for continued exploration. Additional evaluations in and adjoining the WSA are being conducted by both private industry, and governmental agencies.

No non-metallic resources are known to occur in the WSA. However, since any mineral material may have a market as a non-metallic resource, the entire WSA is rated as having a low favorability for nonmetallics.

There are no oil and gas leases or applications in the WSA. The WSA has no indicated favorability for oil and gas.

There are no geothermal applications or leases in the WSA but there are two large blocks of leases adjacent to the northwestern and eastern boundaries. Geothermal exploration is taking place in adjacent Fish Lake VAlley where there area over 25,000 acres of leases. One major geothermal company is exploring and considering geothermal power development in Fish Lake Valley. The entire WSA is rated as moderately favorable for geothermal resources.

CHAPTER 4

Table 4-1 on page 89 of the draft is changed to show on the "Grand Total" line that 14 percent of the area will be in "Mid Seral" stage and 78 percent of the area will be in "Late Seral" stage.

The first sentence of the fourth paragraph on page 90 is changed to "Areas proposed for seedings and watershed rehabilitation have high potential and are presently in an early or mid seral stage."

The first sentence of the fourth paragraph on page 102 is changed to read "Of the 17,850 acres of the Silver Peak Range recommended as suitable, 13,830 acres are classified as moderately favorable for metallic minerals and 60 acres are classified as highly favorable for metallic minerals."

The third sentence of the fifth paragraph on page 106 is changed to read "Approximately 528 acres of Meadow would advance toward its potential plant community, 170 acres would remain in its present successional status, and 5,667 acres would regress to an earlier seral stage."

The second and third sentence of the eight paragraph on page 115 is changed to read "The vegetative succession of approximately 528 acres of meadow would advance towards its natural potential plant community, while 170 acres would remain in the present seral status. About 5,662 acres of meadows would regress in successional stage."

The second sentence of the fourth paragraph on page 140 is changed to read "About 55 acres of streambank riparian vegetation would remain in its present condition or improve, 50

acres would remain in present condition or decline, and 20 acres would remain in its present condition."

The fourth sentence of the fourth paragraph on page 140 starting with "Another 50 acres...." is deleted.

The second sentence of the sixth paragraph on page 140 is changed to read, "Burros would only be slightly reduced in the Bullfrog Herd Area and, therefore, are expected to continue to impact 50 acres of Amargosa River vegetation."

On page 142 insert this sentence before the first complete sentence in the first paragraph "Twenty acres of wet meadows vegetation will not be impacted and will remain in mid-seral status."

APPENDICES

Under the "Resource Management Objectives" column of Appendix C on page 164 for the Magruder Mountain Allotment the second sentence is changed to read "Improve range condition in the Palmetto wash area...."

The second sentence of the sixth paragraph on page 120 is changed to read, "The loamy bottom 3-12" p.z. (29-3), saline meadows 3-12" p.z. (29-2) and loamy upland 5-8" p.z. (29-16) ecological (range) sites are some examples.

The subheading "Category" on Appendix K on pages 190 and 191 is amended by the addition of footnote "b/."

Under subheading, "Ecological site Name and Precipitation Zone (inches per year)" of Appendix C on pages 192 and 192(a) all "p.2." are changed to read "p.z."

Under the subheading "Dominant Potential Plant Species" on Appendix C on pages 192 and 192(a) the following symbols are changed; for site 27x60 change "OBHY" to "ORHY"; for 28x11 delete "HIJA, EPNE" and add "SITCO 4"; for 29 and 21 change "JIJA" to "HIJA."

Under the subheading "Yield (pounds)" of Appendix L on pages 192 and 192(a), the following weights are changed; for site 28x11, change "850-700-40077" to "950-700-400"; for 30x24 change "1600-90-300" to "1600-900-300."

Under subheading "Elevation (feet)" of Appendix C on pages 192 and 192(a), the following is changed; for site 28x11 delete "774"; for 29x17 change "774" to "6500-4400"; for 29x44 through 29x69 (except 29x63) and 30x71 and 30x73 add "00"after each elevation in feet.

REFERENCES

Albers, J.P., "Belt of Sigmoidal Bending and Right-Lateral Faulting in the Western Great Basin," Geologic Society of America, Bulletin, Volume 78, Number 2, pages 143-155, 1967.

Keith, W.J., "Geology of the Red Mountain Mining District, Esmeralda County, Nevada," United States Geological Survey Bulletin 1423, 1977.

Nevada Bureau of Mines, Reno, Nevada. "Bulletin 78, Geology and Mineral Deposits of Esmeralda County, Nevada." Mackay School of Mines, University of Nevada, Reno, 1972.

Nevada Bureau of Mines and Geology, Reno, Nevada. "Reconnaissance Geochemical Assessment of Mineral Resources in the Silver Peak Survey Area (NV-050-338), West Central." University of Nevada, Reno, Nevada, 1984.

U.S. Department of Interior, Bureau of Land Management, "Impacts, Damage to Cultural Resources in the California Desert" by Lyneis, M.M., Weide, D.L. and Warren, E.T., 1980.

(DRAFT) TABLE 2-1
STATUS OF EXISTING WITHDRAWALS AND CLASSIFICATION
AND MULTIPLE USE SEGREGATIONS

NAME/NUMBER	LOCATION	SIZE (ACRES)	STATUS
Ash Meadows PLO 5387 (withdrawal)	T.17S.,R.50E.M.D.M. Section 14, lot 11, Section 35, SW1/4 NE1/4.S1/2 NE1/4 SE1/4, SE 1/4 SE 1/4	136.84	Recommended for retention
Pinyon-Joshua Transition Research Natural PLO 3530 (withdrawal)	T.3S.,R.38E.M.D.M. Section 32, all	640	Recommended for Revocation
Devils Hole (N-257B) (C&MU)	T.17S., R.50E. MDM Sec.35,E1/2NE1/4,N1/2 NE1/4 SE1/4,Sec.36, NE1/4,W1/2,N1/2SE1/4, SE1/4SE1/4 T.13S.,R.51E.,MDM Sec.31, NE1/4NE1/4,W1/2 E1/2,W1/2 T.18S., R.50E., MDM. Sec.1, N1/2N1/2,Sec.2., NE1/4 T.18S.,R.51E., MDM. Sec 6. lots 2 through 6, SW 1/4 NE 1/4, SE1/4 NW1/4,NE1/4 SW1/4, SE1/4	1919.77	Recommended for Retention
Jack Rabbit Spring (N-3319) (C&MU)	T.18S.,R. 51E. MDM Sec.18,SW1/4 NW1/4, w1/2 SE1/4 NW1/4	60	Recommended for Retention
Warm Springs Pupfish (N-27612)	T.17S., R.70E.,MDM Sec.26,S1/2;Sec.34,NE 1/4; Sec.35,N 1/2 N1/2,SE 1/4 NE1/4, SW 1/4 NW1/4, W1/2 SW 1/4,N 1/2 NE 1/4 SE 1/4, NW 1/4,SE 1/4; Sec.36, W 1/2.T.18S., R. 50 E. Sec. 1, Lots 3 and 4; Sec. 2, Lots 1 and 2, S 1/4 NE 1/2.	1419.04	Pending Withdrawal
Ash Meadows (N-29915)	T.18S., R.50E. MDM Sec.13,E 1/2 SW 1/4 SE 1/ E 1/2 W 1/2 SW 1/4 SE 1/4; Sec. 24,NE 1/4 NE 1/4 T. 18S.,R.51E. MDM Sec.18, Lots 2, 3, 4, W 1/2 SE 1/4 NW 1/4, E 1/2 SW 1/4; Sec.19, Lot 1, E 1/2 NW 1/4, SW 1/4, NE1/4.	435.93	Pending Withdrawal

CHAPTER 4

CONSULTATION AND COORDINATION

Chapter 4

CONSULTATION AND COORDINATION

Consultation and coordination with all interested individuals, groups and agencies has been an important part in the development of the draft Esmeralda-So. Nye Resource Management Plan and will continue to play a vital role in the completion of the Proposed Plan/Final Environmental Impact Statement.

SCOPING

Issue Identification

A Notice of Intent to commence land use planning for the Esmeralda-Southern Nye Planning Area was published in the Federal Register on March 11, 1983. Following this notice a letter, dated March 16, 1983, was distributed inviting individuals, organizations and agencies who may be affected by the RMP to attend public workshops. These workshops were held at Silverpeak, NV., Fish Lake Valley, NV, Goldfield, NV., Beatty, NV. and Pahrump, NV. on April 5, 6, 7, 12 and 14, 1983, respectively. The purpose of these workshops were to identify the issues that should be addressed by the RMP. Briefings on issue identification were also given to Nevada Congressional Representatives and Esmeralda County Commissioners on May 9, and 23, respectively.

During the issue identification phase of the process 49 sources of public input produced 60 specific comments which were grouped into eleven "potential issue" categories. These categories included lands and corridors, cultural resources, forest and vegetative products, livestock grazing, minerals, range management, recreation and ORV use, threatened and endangered species, wilderness, wild horse and burros and wildlife habitat.

From these eleven "potential issues", three were chosen as issues. They are: wilderness, lands and corridors, and range management.

Cultural resources were not chosen as an issue because by law they are protected in addition to the lack of known archaeological sites in the planning area.

Areas for the harvesting of forest and vegetative products were raised as a possible issue during scoping. However, since then three harvesting areas have been established which resolved this issue.

As explanined in Chapter One, minerals were not considered an issue in the RMP. The plan will encourage mineral exploration and development in the RMP area with the exception of areas recommended as wilderness. In this case impacts to minerals will be analyzed as part of the wilderness issue.

Recreation was not considered an issue because of the low demand for developed recreational facilities or programs. In addition, recreational use is a relatively low priority compared with other uses in the RMP area. ORV was not considered an issue but is addressed in the plan.

Livestock grazing, threathened and endangered species, wild horses and burros and wildlife habitat are addressed under the rangeland management issue.

Alternatives

On April 11, 1984, a scoping document was distributed outling four potential alternatives that were developed from

the issues identified. This document initiated a 45 day comment period and invited its readers to attend one of the four workshops held during the comment period. These workshops were held in Fish Lake Valley NV., Goldfield, NV., Pahrump, NV. and Las Vegas NV. Again, a briefeing was held for the Esmeralda County Commisioners as well as the Nye County Commissioners.

Prior to the comment period, meetings were held with the Amargosa and Pahrump Planning Boards to explain the planning process and to solicit their input in the development of the land issue portion of the alternatives. As a result of these meetings a map was submitted to the BLM which illustrated which lands should be disposed of in the Pahrump and Amargosa areas under Alternative A.

On March 21, 1984 a meeting with the BLM and U.S. Fish and Wildlife Service (FWS) was held to discuss the Draft Land Protection Plan for Ash Meadows recently completed by the FWS. During this meeting the relationship between the Esmeralda-So. Nye RMP and the proposed Land Protection Plan was discussed.

Soon after the initiation of the comment periods consultation took place on April 19, 1984, with the National Park Services to discuss the alternative boundaries of the Grapevine Mountains and Queer Mountain WSAs, which are adjacent to Death Valley National Monument. A follow-up letter dated June 1, 1984 was received from the park superintendant commenting on the alternatives.

During the alternative scoping process a total of 59 comments were received. Most of these comments expressed either a preference for a particular alternative or a concern over the grouping of management prescriptions in the alternatives.

As a result of scoping minor adjustments were made affecting the land tenure issue of some of the alternatives.

Two other possible alternatives did emerge during the comment period. The first one was to consider using the designation of areas of critical environmental concern (ACEC), in the planning area to protect certain resource values. This alternative was not analyzed because presently their are no ACECS in the RMP area and current management options available are adequate to protect current resource values (see "ACEC" section of Chapter One).

The second possible alternative was submitted by the National Park Service (NPS) and affected the boundary of the Grapevine Mountains WSA. The NPS alternative suggested adding additional acreage to the southeast portion of the WSA. The BLM did not feel that it would aid in the management of the WSA or enhance wilderness values and therefore dropped the alternative from consideration.

PUBLIC REVIEW AND HEARINGS

A Notice of Availability of the Draft RMP and filing of the plan with the Environmental Protection Agency was published in the Federal Register on November 16, 1984. The notice also announced the scheduling of 3 public hearings on the draft, held in Pahrump, NV, Goldfield, NV, and Las Vegas, NV, on January 15, 16, 17, 1985, respectively.

A news release was sent to all local newspapers announcing the availability of the Draft RMP and the dates for each hearing. The closing date of February 19, 1985, for the comment period was included in the notice released to news media on November 14, 1984.

A total of 49 persons attended the three public hearings, with 10 of these making an oral presentation. Letters of comment were received from 63 reviewers.

Most comments could be grouped into 6 major categories. These categories included support for more wilderness (40 comments), support for no wilderness (5 comments), support for ACEC designations (4 comments), concern about wild horse and burro management (3 comments), and concern about riparian habitat (4) comments.

Some of the less frequent comments included season of livestock use, utility corridors, composition of alternatives, monitoring and support for different alternatives.

Transcripts of the public hearings are available for inspection at the Las Vegas District Office at 4765 W. Vegas Drive, Las Vegas, NV, or at the Nevada State Office, Public Affairs Office, 300 Booth Street, Reno, Nevada.

AVAILABILITY OF THE DRAFT RMP/EIS

The draft RMP/EIS were sent to all individuals, agencies, and groups who have expressed an interest in the planning process. Copies of the Draft RMP/EIS were also sent to local agencies and organizations, and are available for review at the listed 13 public libraries and 12 BLM offices. Anyone else wishing a copy of the draft RMP/EIS may receive one by calling or writing the BLM Las Vegas District at P.O. Box 26569, Las Vegas,NV 89126, (702) 388-6403.

The following is a partial list of those who received copies of the draft RMP/EIS.

Congressional Delegation

Senator Paul Laxalt, Nevada
Senator Chic Hecht, Nevada
Representative Harry Reid, Nevada
Representative Barbara Vucanovich, Nevada

Federal Agencies

Advisory Council on Historic Preservation
Department of Agriculture
- Forest Service
- Soil Conservation Service
- Agricultural Stabilization and Conservation Service

Department of Commerce
- National Oceanic and Atmospheric Administration

Department of Defense
- Nellis Air Force Base
- George Air Force Base
- Edwards Air Force Base
- Army Corps of Engineers

Department of Energy
- Bonneville Power Administration

Department of the Interior
- Bureau of Indian Affairs
- Bureau of Mines
- Bureau of Reclamation
- Fish and Wildlife Service
- Geological Survey
- National Park Service
- Office of Environmental Project Review

Department of Transportation
Environmental Protection Agency

State Agencies

Office of the Governor
Nevada State Clearinghouse
- (25 copies) - distributes copies to State Agencies

Nevada Department of Wildlife
State Senators and Assemblymen
- (Esmeralda and Nye Counties)

University of Nevada, Reno and/or Las Vegas
- Desert Research Institute
- Fleischmann College of Agriculture
- Center for Business and Economic Research
- Department of Biological Sciences
- Mackay School of Mines
- Nevada Bureau of Mines

Local Government

Nye County Commissioners
Esmeralda County Commissioners
Amargosa Town Board

Amargosa Planning Board
Pahrump Town Board
Pahrump Planning Board
Pahrump Town Manager
Nye County Planning Department
Esmeralda County Game Management Board
Beatty Town Board

Others

Grazing Lease Holders within the RMP Area
Nevada Power Company
Sierra Pacific Power Company
Valley Electric Association
Nevada Bell
Las Vegas District Grazing Advisory Board
Nevada Cattlemen's Association
Multiple Use Advisory Board on Federal Land Laws
Las Vegas and Battle Mountain District Advisory Boards
National Wildlife Federation
Natural Resources Defense Council
Sierra Club
Earth First
The Wilderness Society
Audubon Society
Humane Society of Southern Nevada
International Society for the Protection of Mustangs
Nevada Miners and Prospectors Association
Nevada Mining Association
Nevada Outdoor Recreation Association
Nevada Wildlife Federation
Nevada Woolgrowers Association
Nevada Wilderness Association
Nevada Wildlife Association
Northern Nevada Native Plant Society
Society for Range Management
Sunshine Mining Company
Foote Mineral Company
Nevada League of Women Voters
Industrial Mineral Ventures
American Borate Corporation
American Mining Congress
Animal Protection Institute
American Horse Protection Association
Desert Tortoise Council
Desert Bighorn Council
Fraternity of Desert Bighorn
Friends of Nevada Wilderness
Greenpeace
ORV Groups

Public Libraries

Amargosa Public Library
Star Route 15
Box 401-T
Lathrop Wells, Nevada 89020

Beatty Community Library
323 Montgomery
Beatty, Nevada 89002

Charleston Heights Library
800 Brush Street
Las Vegas, Nevada 89107

Clark County Community College
Learning Resource Center
3200 E. Cheyenne Ave.
North Las Vegas, Nevada 89030

Clark County Library
1401 E. Flamingo Rd.
Las Vegas, Nevada 89109

Esmeralda County Public Library
County Courthouse
Goldfield, Nevada 89013

Esmeralda County Public Library
Silver Peak, Nevada 89047

Las Vegas Public Library
1762 E. Charleston Blvd.
Las Vegas, Nevada 89104

Mount Charleston Public Library
P.O. Box 269, S. R. 89038
Mt. Charleston, Nevada 89101

North Las Vegas Library
2300 Civic Center Dr.
North Las Vegas, Nevada 89030

Pahrump Public Library
Pahrump, Nevada 89041

University of Nevada, Reno
Getchell Library
Government Publications Dept.
Reno, Nevada 89507

Washoe County Library
301 S. Center Street
Reno, Nevada 89505

Bureau of Land Management Offices

Office of Public Affairs, BLM
18th and C Streets, NW
Washington, DC 20240

Nevada State Office
300 Booth Street
Reno, Nevada 89520

Battle Mountain District Office
North 2nd and South Scott Streets
P.O. Box 1420
Battle Mountain, Nevada 89820

Carson City District Office
1050 E. William Street
Carson City, Nevada 89701

Elko District Office
2002 Idaho Street
Elko, Nevada 89801

Ely District Office
Star Route 5, Box 1
Ely, Nevada 89301

Las Vegas District Office
4765 West Vegas Drive
Las Vegas, Nevada 89126

Tonopah Resource Area Office
Battle Mountain District
102 Old Radar Base Rd.
Tonopah, Nevada 89049

Winnemucca District Office
705 East 4th Street
Winnemucca, Nevada 89445

Riverside District Office
1695 Spruce Street
Riverside, California 92507

Ridgecrest Resource Area Office
Riverside District
1414 A. N. Norma
Ridgecrest, California 93555

Needles Resource Area Office
Riverside District
P.O. Box 305
Needles, California 92363

AVAILABILITY OF THE PROPOSED RMP AND FINAL EIS

This document has been mailed to all those who received copies of the Draft RMP/EIS as well as those who commented on the Draft RMP/EIS. A Federal Register Notice and news releases have been issued to inform the public of the availability of this document. A limited number of copies are available upon request from the Las Vegas District Office. Review copies are available at the listed BLM Offices and Public libraries.

HEARING TESTIMONY ON THE DRAFT RMP/EIS

Public hearings were held in Pahrump, Nevada; Goldfield, Nevada; and Las Vegas, Nevada on January 15, 16, and 17, 1985, respectively. Testimony was given at the following locations by the individuals listed.

Pahrump, Nevada

T-1 Doug Driesner (Nevada Bureau of Mines and Geology)
T-2 Charles Hollis
T-3 Tim Hafen
T-4 Audrey Bradbury

Goldfield, Nevada

T-5 Alan Young (Sunshine Mining Company)
T-6 Edward Tomany (Production Exploration Resources)
T-7 Don Earnest (Sunshine Mining Company)
T-8 Doug Driesner (Nevada Bureau of Mines and Geology)
T-9 William Wright

Las Vegas, Nevada

T-10 Woody Dulin (Valley Electric)

Written comments addressing the same issues presented in their testimony were received from individuals T-1,

T-5, T-6, T-7, T-8 and T-9 or the companies they represented. Participant T-3 gave his support for the Alternative A, except for the wilderness recommendation, for which he had no comment. Participant T-10 gave his support for the Preferred Alternative referring to the issue of utility corridors. Participant T-2 discussed wilderness areas already studied in the Clark County Wilderness EIS, 1983.

Participant T-4 commented on land disposals as outlined in the draft. She stated "For an alternative to bring a lot more land up and the population should get larger, we should consider the water." Her concern is addressed in response 1-3.

WRITTEN COMMENTS AND RESPONSES ON THE DRAFT RMP/EIS

All the written comments on the draft were reviewed. Substantive comments which questioned facts or analysis, or commented on issues directly affecting the draft, were fully evaluated and are responded to in this document. Page 101 of this section contains the comments received from Governor Bryan following the State's Consistency Review of the Preliminary Final RMP/EIS. Their response is essentially the same as the one submitted on February 19, 1985 (comment letter 22).

All the letters have been reprinted in this document. The responses to the written comments are listed following the letters. Each response is given a number which corresponds to numbered paragraphs or sections in the actual public comments. To find the BLM response to any particular section, simply look for the bold number directly to the left of the statement and then turn to the "response" section and find the same number. The following is an index to written comments.

LETTER NO.	COMMENTOR
1	NPS-National Park Service Death Valley National Monument
2	Altantic Richfield Company
3	Elliott Bernshaw
4	Southern California Edison
5	Wild Horse Organized Assistance
6	Virlis Fischer
7	National Park Service - Western Region Office
8	Nevada Wildlife Federation (LV)
9	Production Exploration Resources
10	U.S. Geological Survey - Engineering Geology
11	William Wright
12	Wildlife Society - Nevada Chapter
13	Division of State Lands
14	Department of Energy - Western Area Power Administration
15	Inspiration Mines, Inc.
16	Women In Mining
17	The Wilderness Society
18	Sierra Club - Las Vegas Group
19	Wildlife Management Institute
20	Walter Barbuck
21	Joseph and Mary Viscuglia
22	Nevada State Office of Community Services Nevada State Governor's Consistency Review Department of Agriculture Department of Transportation Department of Wildlife Department of Minerals Department of State Lands Department of Conservation and Natural Resources Division of Forestry Nevada Bureau of Mines and Geology
23	Becky Parr

24 Harry Melts
25 John Swanson
26 S. M. Frankiel
27 Desert Bighorn Council
28 Daniel Cummings
29 Betty, Rex and Scott Mason
30 The Nature Conservancy
31 Iva M. Perkins
32 Marsha George
33 Randal Seech
34 Defenders of Wildlife
35 Jim Mayberry
36 Sierra Club
Great Basin Group
37 Jo Neugent
38 Maicea Stohlman
and Gary Kohoutek
39 Glen Miller
40 Edward Dverr
41 Ann Kersten
42 Terry Woodin
43 Lawrence A. Dwyer
44 Reed Family Investments
45 Gregory P. Ebner
46 Drury Sherrod
47 Sarah Bailey Gyer
48 Lisa Faith Wood
49 Stuart Claney
50 Paul Clifford
51 Sunshine Mining Company
52 American Film Institute
53 Environmental Protection
Agency
54 Alison Hutchings
55 Tim Heidrich
56 A. Huntington
57 Duncan Williams
58 Robert Furtek
59 Lucy E.Trostle
60 Cheri Cinkoske
61 Marlee Ostrow
62 Ann Pitchford
63 Susanne Madden

Comment Letter 1

United States Department of the Interior

NATIONAL PARK SERVICE
DEATH VALLEY NATIONAL MONUMENT
DEATH VALLEY, CALIFORNIA 92328

IN REPLY REFER TO:

L3023

December 21, 1984

Mr. Kemp Conn
District Manager
Bureau of Land Management
P.O. Box 26569
Las Vegas, NV 89126

Dear Mr. Conn:

Thank you for the opportunity to comment on the Esmeralda-Southern Nye Planning Area Draft Resources Management Plan and Environmental Impact Statement (EIS).

We have reviewed the document and offer the following comments:

1. Both of the Wilderness Study Areas (WSA) that border Death Valley National Monument (060-0354 and 06-0355) appear to be suitable for wilderness designation. Neither one is included at any level in the Preferred Alternative and both are excluded from the No Action Alternative and Alternative A.

1-1 The Grapevine Mountains WSA (NV 060-0354) is adjacent and ecologically bound to the monument's proposed wilderness. The area contains known desert bighorn and deer range. The statements in the EIS on mineral potential in this area are not compelling to the point of excluding designation under Alternative B.

The Queer Mountain WSA (NV 060-0355) is also adjacent to Death Valley National Monument and enhances proposed National Park Service (NPS) wilderness. Again the statements in the EIS on mineral potential are not sufficiently compelling to exclude designation.

1-2 2. The NPS prefers the land disposal scheme in Alternatives B and C. Under these Alternatives, 10,726 acres in the vicinity of Beatty and Buck Spring would not be disposed. The area around Buck Spring is historic desert bighorn range and should be retained under Federal ownership.

Comment Letter 1

1-3 In the Amargosa area, west of Highway 373 (Highway 29), 26,880 acres are scheduled for disposal under the Preferred Alternative and Alternative A. This parcel is adjacent to and abutts Death Valley National Monument for 1.5 miles. The effect of water withdrawal from this land, should development occur, is not addressed in the EIS.

Sincerely,

Edwin L. Rothfuss
Superintendent

Comment Letter 2

AtlanticRichfieldCompany
Public Affairs
555 Seventeenth Street
Denver, Colorado 80202
Telephone 303 293 7578

C.M. Moseley
Representative
Rocky Mountain Region

December 31, 1984

Mr. Kemp Conn
District Manager
Battle Mountain District
Bureau of Land Management
P. O. Box 26569
Las Vegas, NV 89126

Re: Esmeralda-Southern Nye Resource Area -Nevada
Draft RMP and DEIS

Dear Mr. Conn:

Atlantic Richfield Company appreciates the opportunity to comment on the Draft Resource Management Plan and Draft Environmental Impact Statement for the Esmeralda-Southern Nye Resource Area in Nevada.

We support the adoption of the Preferred Alternative in that it recommends a nonwilderness designation for the Resting Springs Wilderness Study Area. As you are aware, Anaconda Minerals Company, a Division of Atlantic Richfield Company, has claims adjacent to the Resting Springs Area. We are, therefore, interested in having the area remain open for possible future mineral exploration. We also support the nonwilderness recommendations for Grapevine Mountains, Pigeon Spring, and Queer Mountain. The concept of eliminating mineralized acreage from the Silver Peak Range in order to avoid potential conflicts with claimants is also supported. Further, it is important that minerals play an active role in wilderness decisions. It is encouraging to find that the BLM has indeed taken these resource values into consideration during the wilderness study process and has made its decision accordingly.

Again, we appreciate this opportunity to comment. Please contact us if you have any questions.

Sincerely,

C. M. Moseley

CMM/ko

Comment Letter 3

BERNSHAW PHOTOGRAPHY
Box 6235
Salt Lake City, Utah
84106

December 28, 1984

Mr. Kemp Conn, District Mgr.
Esmeralda-Southern Nye
R.M.P. Team
Bureau of Livestock and Mining
Las Vegas, Nevada

Dear Mr. Conn:

COMMENTS ON: ESMERALDA-SOUTHERN NYE Draft R.M.P.

I most vehemently and totally object to your use--yes, "use"--of a picture of a bighorn sheep on the covers of your Esmeralda-Southern Nye Draft R.M.P. & E.I.S. and Wilderness Technical Report.

Instead, be a bit more honest and take a picture of a cow. Or a drilling rig. Or a bulldozer.

Your disgusting draft R.M.P. does honor to James Watt, whose glorious portrait should be on the covers of these publications.

I find it impossible for myself to responsibly respond to...

(a) your puny wilderness recommendations and lack of co-operation with the National Park Service's desire to see wilderness designation for your BLM Grapevine Mts. which form an ecological whole with Death Valley's Grapevine Mts.;

(b) your possible pro-gambler, pro-land speculator and pro-developer land disposal of 245,000 to 95,000 acres;

(c) your refusal to reduce and restrict (over-)grazing despite the lousy condition of most of your range, and your preference instead to "improve" the range instead of removing the damn cows.

For the life of me, I wonder to high-heaven how anyone who calls themselves a wilderness/recreation coordinator ("Poppy" Benson & Cal McKinley) or a wildlife biologist (Mark Maley & Mike Ford) can allow their name and professional reputation to be associated with this document. Amen, brothers. Earth First!

Yours very most sincerely,

Elliott E. Bernshaw

Comment Letter 4

Southern California Edison Company

SCE

P.O. BOX 410
100 LONG BEACH BOULEVARD
LONG BEACH, CALIFORNIA 90801

R. J. JULIFF
MANAGER
OF
REAL PROPERTIES DEPARTMENT

January 10, 1985

Mr. Kemp Conn
District Manager
Bureau of Land Management
Las Vegas District Office
P.O. Box 26569
Las Vegas, Nevada 89126

Dear Mr. Conn:

Subject: Esmeralda-Southern Nye Planning Area
Resource Management Plan (RMP) and
Environmental Impact Statement (EIS)-Draft

Based on our review of the subject RMP report and our current information, we have the following comments and recommendations for your consideration.

We are pleased to see the recognition by the planning team of future corridor needs as an issue in the RMP. Corridor designation is a critical element of land use planning and is necessary to insure that routes are available for the orderly and efficient development of communication, energy and transportation systems to serve the public. We concur with the corridor element of the preferred alternative, however, we recommend that it be revised to designate that corridors be a minimum of three miles in width.

4-1

Designation of the corridors shown in the Preferred Alternate will provide the organizations responsible for developing communication, energy, and transportation systems for the public, a means of providing these services in an economical and dependable manner. In addition, a minimum corridor width of three miles will enable flexibility in siting facilities to avoid environmentally sensitive areas.

Thank you for inviting our comments. We hope you will give them your full consideration. If further details are needed, please contact Mr. J. R. Wilson at (213) 491-2992.

Very truly yours,

R. J. Juliff

JRWilson/1371f/elw

Comment Letter 5

WHOA!

WILD HORSE ORGANIZED ASSISTANCE
INC.
A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

BOARD OF TRUSTEES
DAVID R. BELDING
JACK C. McELWEE
GORDON W. HARRIS
BELTON P. MOURAS
GERTRUDE BRONN, Honorary
In Memoriam
LOUISE C. HARRISON
VELMA B. JOHNSTON, "Wild Horse Annie"

P. O. Box 555
Reno, Nevada 89504
Telephone ~~323-1906~~
Area Code 702
851-4817

January 6, 1985

Mr. Kemp Conn, District Manager
Bureau of Land Management
Post Office Box 26569
Las Vegas, Nevada 89126

Re: ESMERALDA-SOUTHERN NYE PLANNING AREA

Dear Mr. Conn:

Thank you for the opportunity to comment on the Draft Esmeralda-Southern Nye Resource Management Plan and Environmental Impact Statement. WHOA is pessimistic that this process will change the statis quo, however, for administrative purposes we submit our comments for consideration in the final land use plan. WHOA is numb from the numerous plans, but this one was the hardest to digest. We are thankful for the summary, which simplified a hard to track document.

LIVESTOCK

WHOA supports Alternative B for livestock grazing. The preferred alternative only maintains what is a policy of no action and monitoring. Range improvements for livestock grazing on public lands, with taxpayer dollars, should be constructyed only. after monitoring shows the need. The projects must be multiple use. Any waters developed on public land with tax dollars must benefit multiple use, including wild horses, and any improvements with private dollars on public lands must have siptulations on the permits for multiple use, including wild horses. The establishment of sufficient monitoring studies to attribute use to the particular animals, to the extent possible. Should the offender of over grazing be livestock, the reductions should be made in livestock. Should the offender be wild horses. the reduction in wild horses. Should the offense come from both the reductions should be made on a pro-rata basis.

MONITORING Will sufficient funds be available to carry out the monitoring program so that further down the road we are not looking at the same problems as now? Who will read the monitoring studies and how often will they be read?

5-1

Comment Letter 5

Page two-Esmeralda-Southern Nye EIS/RMP

WILDLIFE

WHOA supports ALTERNATIVE B for wildlife, with monitoring providing adjustments in wild horses and livestock as data requires. Should adjustments be necessary they should be made first in critical wildlife habitat first.

WILDERNESS

Wilderness enhances and protects wildlife and wild horse habitat. WHOA supports ALTERNATIVE A for wilderness. Wild horse management plans must be an intregal part of the proposed package to Congress as part of the existing use.

LAND TENURE

WHOA supports ALTERNATIVE A as the need arises. Ammple opportunity exists for community expansion and agricultural development without seeking relief from that system.

CORRIDORS

WHOA supports ALTERNATIVE A as the need arises.

WILD HORSES

Wild horse habitat is quickly diminishing overall due to livestock operators and private lands. Horses reside in only 30% of the State of Nevada, and that is being reduced sugnificantly. WHOA has agreed in the past to reductions of wild horses, however, we believe that any further reductions should be based on range data that substantiates the need. That means proper monitorings that attribute use to the particular animal to the extent possible. The law not only requires you protect, management and control the wild horse; but that the BLM also shall provide for their biological needs, one of which is water. All waters on public lands must be for multiple use purposes or stipulations on the permits to provide water for wild horses.

Most sincerely,

Dawn Y. Lappin

Dawn Y. Lappin (Mrs.)
Director

2

Comment Letter 6

VIRLIS L. FISCHER
3505 VICTORY AVENUE
LAS VEGAS, NEVADA 89121

January 14, 1985

Mr. Kemp Conn, District Manager
Bureau of Land Management
P. O. Box 26569
Las Vegas, Nevada 89126

Dear Kemp:

Thank you for sending me a copy of the Draft EIS for the Esmeralda-Southern Nye Planning Area. I think your analysis of all factors has been thorough and highly professional, and I wish to indicate hereby my support of the Preferred Alternative. I also agree that four of the five WSAs do not qualify for wilderness recommendation. The portion of the WSA in the Silver Peak Range which you are recommending for wilderness, while not the greatest, nevertheless does not arouse any opposition from me.

Thank you for the opportunity to participate.

Very truly yours,

Virlis L. Fischer

Virlis L. Fischer

Comment Letter 7

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Ridgecrest Resource Area
112 East Dolphin Street
Ridgecrest, California 93555

IN REPLY REFER TO:
4000
(C065.2)

JAN 11 1985

Memorandum

To: District Manager, Las Vegas District

From: Area Manager, Ridgecrest Resource Area

Through: District Manager, California Desert District

Subject: Esmeralda-Southern Nye Planning Area Draft RMP and EIS

Our comments on the above RMP/EIS pertain only to the interaction between livestock and wildlife. We are concerned that year-long cattle grazing in the Magruder Allotment will result in cattle drift from Nevada into areas in California, the Last Chance Allotment, which we may restrict seasonally (from grazing) to protect habitat for bighorn sheep and deer.

Because the Magruder and Last Chance Allotments are adjacent, we would appreciate the opportunity to closely coordinate our planning effort with yours in order to ensure compatibility.

Patricia E. McLean

United States Department of the Interior

NATIONAL PARK SERVICE
WESTERN REGION
450 GOLDEN GATE AVENUE, BOX 36063
SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:

L7619(WR-RPE)

January 15, 1985

Memorandum

To: District Manager, Bureau of Land Management, Las Vegas, Nevada

From: ACTING Regional Director, Western Region

Subject: Esmeralda-Southern Nye Resource Management Plan and Environmental Impact Statement

7-1 In accordance with the State Director, Bureau of Land Management, Nevada memorandum of November 16, 1984, we have reviewed the subject document. This office has no comments on this statement. However, our Death Valley National Monument staff has also reviewed the document and has previously provided you with comments by letter of December 21, 1984. A copy of this letter is attached.

We appreciate the opportunity to review and comment on your plan and statement.

W. Russell Smith

Enclosure

cc:
Supt., DEVA
WASO 762 w/encl.

DM		
ADM		
PAO		
CHRM		
COOPER		
[illegible]		
[illegible] SRA		
AM CALIENTE		

United States Department of the Interior

NATIONAL PARK SERVICE
DEATH VALLEY NATIONAL MONUMENT
DEATH VALLEY, CALIFORNIA 92328

IN REPLY REFER TO:

L3023

December 21, 1984

Mr. Kemp Conn
District Manager
Bureau of Land Management
P.O. Box 26569
Las Vegas, NV 89126

Dear Mr. Conn:

Thank you for the opportunity to comment on the Esmeralda-Southern Nye Planning Area Draft Resources Management Plan and Environmental Impact Statement (EIS).

We have reviewed the document and offer the following comments:

1. Both of the Wilderness Study Areas (WSA) that border Death Valley National Monument (060-0354 and 06-0355) appear to be suitable for wilderness designation. Neither one is included at any level in the Preferred Alternative and both are excluded from the No Action Alternative and Alternative A.

The Grapevine Mountains WSA (NV 060-0354) is adjacent and ecologically bound to the monument's proposed wilderness. The area contains known desert bighorn and deer range. The statements in the EIS on mineral potential in this area are not compelling to the point of excluding designation under Alternative B.

The Queer Mountain WSA (NV 060-0355) is also adjacent to Death Valley National Monument and enhances proposed National Park Service (NPS) wilderness. Again the statements in the EIS on mineral potential are not sufficiently compelling to exclude designation.

2. The NPS prefers the land disposal scheme in Alternatives B and C. Under these Alternatives, 10,726 acres in the vicinity of Beatty and Buck Spring would not be disposed. The area around Buck Spring is historic desert bighorn range and should be retained under Federal ownership.

Comment Letter 7

In the Amargosa area, west of Highway 373 (Highway 29), 26,880 acres are scheduled for disposal under the Preferred Alternative and Alternative A. This parcel is adjacent to and abutts Death Valley National Monument for 1.5 miles. The effect of water withdrawal from this land, should development occur, is not addressed in the EIS.

Sincerely,

Edwin L. Rothfuss
Superintendent

Comment Letter 8

NEVADA WILDLIFE FEDERATION, INC.

An Affiliate of the National Wildlife Federation

820 EAST SAHARA AVENUE / LAS VEGAS, NEVADA 89104

January 20, 1985

Mr. Kemp Conn, Dist. Mgr.
Bur. Land Manag.
P.O. Box 26569
Las Vegas, Nv. 89126

Dear Mr. Conn:

After studying the Draft EIS for the Esmeralda- S. Nye Planning Area, we wish to go on record as supporting your Preferred Alternative. From a wildlife standpoint, there is real need for water development. There is need to reduce horse and burro numbers to ease competition with cattle and native wildlife, vegetative manipulations should be done, and we would like to see sagegrouse reintroduced into historic range.

We are in full agreement that the Grapevine Mtns., Pigeon Sprs., Queer Mtn., and the Resting Spr. Range do not qualify for wilderness designation. While the Silver Peak Range has some merit as a wilderness, it will hardly qualify as one of the crown jewels of the wilderness system. We offer no objection to your recommendation per the preferred alternative.

Thank you for the opportunity to comment. We hope our support will be of some help in determining future management directions.

Sincerely yours,

John A. Leitch

John A. Leitch, DDS
President

cc: Fred Wright

CONSERVE OUR NATURAL RESOURCES

Comment Letter 9

PRODUCTION EXPLORATION RESOURCES

Edward M. Tomany P. O. Box 452 Tonopah, Nevada 89049 702-482-3973

January 16, 1985

Bureau of Land Management
Project Manager Mr. Kemp Conn
Post Office Box 26569
Las Vegas, Nevada 89126

Subject: Draft-Resource Management Plan, and Environmental Impact Statement for Esmeralda - Southern Nye Planning Area, Nevada

Dear Mr. Conn:

My name is Edward M. Tomany, I own and operate a private geologic and mining consulting company, the present address of which is: P.O. Box 452, Tonopah, Nevada, 89049; telephone (702) 482-3973. I have several comments to make concerning the Esmeralda - Southern Nye Planning Area Draft Resource Management Plan and Environmental Impact Statement.

Comment # 1 -

9-1

On page 41, Chapter 3, AFFECTED ENVIRONMENT, I quote, "There is a constant attrition of these resources as surface disturbing activities relating to mining, ranching, farming, and the like take their toll. Some extremely important sites are being destroyed or extensively damaged with little regard to cultural values."

This statement goes beyond suggestion that the environment is being damaged. Specifically, it states damage is, and has been, and continues to be done in the study area. I request you produce the data showing specific damages and identify the parties responsible. It appears to me that the manner in which you have stated this fact, might well be lacking true detail and fact. If so, I request you retract and remove the statement from the report.

Comment # 2 -

9-2 Public Law 94-579, 94th Congress, October 21st, 1976, Title VI - Designated Management Areas, Section 603, Bureau of Land Management Wilderness Study, sets forth the policy and guidelines for wilderness study and identification. Section 603 does not dictate the requirement that each State of the United States is responsible to provide a wilderness or any portion of wilderness to satisfy the regulation. For the fact, Public Law 94-579, 94th Congress, October 21st, 1976 (F.L.P. M. Act of 1976) Section 101 through Section 707 sets no state requirement to provide wilderness or any portion of wilderness for consideration for withdrawal.

9-3 On page 65 of the Esmeralda - Southern Nye Planning Area Draft Resource Management Plan and Environmental Impact Statement, I quote your conclusion under the diversity criteria, "The State of Nevada is underrepresented in the NWPS with only one designated area, the Jarbridge Wilderness, on the Oregon border."

The Bureau of Land Management, Department of the Interior has no right or authority to make this statement. Further, this report is not required to report or represent any information other than fact gathered and under authority prescribed by Public Law 94-579. The inclusion of this statement is outside of any authority granted to the Bureau of Land Management; further, it is defamatory to the State of Nevada and the residents of the State of Nevada. I request you remove this statement from the report.

Comment # 3 -

9-4 I would like to address the basic facts concerning the mineral potential of the five proposed wilderness study areas in the Esmeralda - Southern Nye Study. On page 151, Alternative C, Social Values, I quote, " However, since no detailed minerals inventory exists for each of the five WSA's,"; I suggest that the minerals inventory is invalid. To proceed any further in wilderness consideration is in violation of the authority granted

Comment Letter 9

under Public Law 94-579, Section 603: provided, that prior to any recommendations for the designation of an area as wilderness, the Secretary shall cause mineral surveys to be conducted by the Geological Survey and the Bureau of Mines to determine the mineral values, if any, that may be present in such areas.

The Bureau of Land Management has designated five wilderness study areas, the Bureau of Land Management further acknowledges that no mineral inventory exists. Public Law 94-579, Section 603 provides that a complete mineral inventory is required before it can designate an area as wilderness or prior to any recommendation for a wilderness designated area.

9-5 I request that you halt any further discussion or hearings on the management plan, due to the failure of the Bureau of Land Management to legally and properly conduct its activities directed specifically towards the mineral inventories, your report is unsatisfactory to say the least.

I have sent a copy of my comments to my Nevada representatives: the Honorable Paul Laxalt, U.S. Senator; the Honorable Chic Hecht, U.S. Senator; the Honorable Barbara Vucanovich, U.S. Congresswoman.

I hereby request a reply to my letter and comments one through three.

Very truly yours,

Edward M. Tomany

EMT/ca

certified mail # P211527634

cc: Honorable Paul Laxalt
Honorable Chic Hecht
Honorable Barbara Vucanovich
file

Comment Letter 10

United States Department of the Interior

GEOLOGICAL SURVEY
RESTON, VA. 22092

In Reply Refer To:
WGS-Mail Stop 423
DES 84/60

JAN 30 1985

Memorandum

To: District Manager, Bureau of Land Management
Las Vegas, Nevada

From: Assistant Director for Engineering Geology

Subject: Review of draft environmental statement for Esmeralda-Southern Nye Resource Management Plan, Nye and Esmeralda Counties, Nevada

We have reviewed the draft statement as requested in a letter of November 16 from the State Director, Bureau of Land Management, Nevada.

10-1 We note in Table 2-5 that range improvement projects will include spring development as well as construction of 7 to 12 wells. This part of the plan does not seem to be included in the discussion of management prescriptions and management and improvement of water resources. The final statement should clarify the plans in this regard.

The discussion of mineral-resource potential is clear and well documented, although the addition of a map showing areas of mineral potential would be helpful.

10-2 The acreage of land classified as moderately favorable for metallic minerals should be 13,830 acres, not 13,380 acres (p. 102, par. 4, lines 2-3), for consistency with information provided elsewhere (for example, Summary Table 2, p. iv; p. 97, par. 5).

for James F. Devine

Comment Letter 11

February 5,1985

Stephen Mellington, Project Manager
Bureau Of Land Management
P.O. Box 26569
Las Vegas, Nevada 89126

Dear Stephen:

In the Esmeralda Southern Nye Draft Resource Management Plan your season of use Sept. 1, to Jan. 15th. is not compatible with private and forest land use.

11-1 On Sept. 15th. I come off the Forest Service grazing onto B.L.M. I have to stay on B.L.M. until late November or until the alfalfa freezes then I pasture on the alfalfa fields until late March or early April when the alfalfa starts to grow I then go back on the B.L.M. until June 15th. or July 1st., at which time I go back on the Forest Service grazing.

Since obtaining this B.L.M. grazing permit I have installed two watering troughs on theEast side of the Valley I have also built a drift fence between deeded land in the center of my lease which makes it possible to contain livestock totally on one range or the other and makes it possible to better utilize the range. The East side has in excess of a township which has never been grazed due to no water. Last year I kept my cattle totally on the East side of the range until I went on the Forest Service grazing and in the Fall came out on the West side of the range which has never been done in the past. I can now alternate from the East pasture to the West pasture every other year and therefore it is much better on the range forage.

11-2 With the new improvements a change in season of use and increased A.U.M's from 501 to 650 as proposed in Alternative A will not lead to the downward range trend reflected in the R.M.P. as livestock grazing is the best use of the rangeland in Fish Lake Valley.

Very truly yours,

Wm. S. Wright
Star Route
Dyer, Nevada 89010

cc: Tim Burke

2/4/85

The Wildlife Society

Western Section

nevada chapter

Founded 1937

Mr. Kemp Conn
District Manager
Bureau of Land Management
P.O. Box 26569
Las Vegas, Nevada 89126

Dear Mr. Conn:

The following represent comments made on the Esmeralda-Southern Nye Planning Area Draft Resource Management Plan and Environmental Impact Statement. These comments are submitted on behalf of the Nevada Chapter of the Wildlife Society.

12-1 Summary Table One - Does the information in the table apply to both or one of the planning areas?

12-2 Summary Table Two - Same comment as Summary Table One.

12-3 Location Map - National Forest lands depicted on the map are the Inyo National Forest, not the Toiyabe National Forest.

Page 19, second column, second paragraph - This paragraph is misleading. The manageability of private land would be improved as only public land would be transferred to private ownership.

Comment Letter 12

The Wildlife Society

Western Section

nevada chapter

Founded 1937

12-4 Page 90, first column, last paragraph (riparian vegetation) - Fifty acres of streamside riparian vegetation and 115 acres of meadow will either remain in present condition or decline. This is contradictory to the statement on page nine (second column, fourth paragraph) which states "managment activities in riparian zones will be designed to maintain or, where possible, improve riparian habitat condition." Why does the Preferred Alternative not abide by the management guidance common to all alternatives?

12-5 Page 92, first column, last paragraph - "Proposed utility corridors would adversely affect the habitats of mule deer." Nothing is mentioned in the document as to how this adverse impact will be mitigated.

12-6 Page 92, second column, first paragraph - "The pool of land identified for disposal contains aquatic and streambank habitat." This area is considered to be crucial habitat for the Amorgosa speckled dace and Amorgosa toad. Instead of delaying the decision until later regarding the disposal or retention of these crucial habitats, why not make the decision within this document? The disposal of these areas would not be in the best interest of wildlife management within the State of Nevada. This would not change either now or in the future.

The Nevada Chapter of the Wildlife Society appreciates the opportunity to comment on this document.

Robert Mason
Chairman - Conservation
Review Committee

The International Organization of Professional Wildlife Ecologists and Managers

Comment Letter 13

Division of State Lands
State Land Office
State Land Use Planning Agency
(702) 885-4363

Address Reply to:
Division of State Lands
201 S. Fall Street
Capitol Complex
Carson City, Nevada 89710

STATE OF NEVADA

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

Division of State Lands

February 7, 1985

Kemp Conn, District Manager
Las Vegas District
Bureau of Land Management
P.O. Box 26569
Las Vegas, Nevada 89126

Dear Kemp:

Our review of the Draft Esmeralda-Southern Nye Planning Area Resource Management Plan and Environmental Impact Statement indicates that the preferred alternative appears to be an acceptable alternative for the Bureau's land management programs. The preferred alternative seems to be beneficial for most interests and should satisfy most of the concerns that have been raised.

This support for the preferred alternative, however, does not extend to wilderness considerations. Our position on wilderness will be developed with other state agencies and included in the Governor's recommendation. The position may, or may not, be consistent with the wilderness proposal contained in the preferred alternative. You should be aware that designation of wilderness areas in Esmeralda County is strongly opposed by local government as expressed in a resolution by the County Commissioners and through various hearings and federal land management workshops.

The preferred alternative also appears to be the best alternative presented for wildlife and livestock use. We would prefer to see a reduction in wild horse and burro populations where impacts are significant prior to monitoring confirmation; however, we feel the proposal for later adjustments, where needed, to be satisfactory.

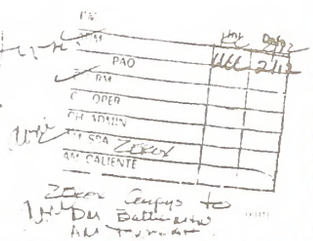
Land disposal potentials contained in the preferred alternative, while not as large as those proposed in other alternatives and perhaps not as extensive as those proposed by local governments, appear to be a good beginning toward proper adjustment of the land tenure problem. Land disposals, where resource conflicts have been eliminated or are not significant, are appropriate and should be implemented with close coordination with state and local governments.

Sincerely,

Mike Del Grosso
Land Use Planner

JMD:jsd

cc: State Clearinghouse



Comment Letter 14

Department of Energy
Western Area Power Administration
Boulder City Area Office
P.O. Box 200
Boulder City, NV 89005

FEB 8 1985

Refer To: G1010

Mr. Kemp Conn
District Manager
Bureau of Land Management
P.O. Box 26569
Las Vegas, Nevada 89126

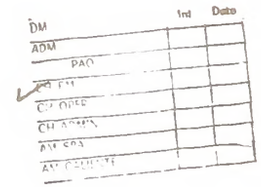
Dear Mr. Conn:

We appreciate the opportunity to review the draft Resource Management Plan and Environmental Impact Statement for the Esmeralda-Southern Nye planning area. Western's directive to meet public demand for Federal power using Federal transmission lines will be provided by BLM establishing utility corridors. We support the preferred Alternative which provides for a mix of natural and commercial resource uses while minimizing disruption of the human environment. Western could also support Alternative A.

Our other comment concerns the drawings for each alternative. The utility corridors are designated by horizontal lines; however, the key was inadvertently left blank. You might consider correcting the key for the Final EIS.

Sincerely,

G. J. Giles
Assistant Area Manager
for Management Services



Comment Letter 15

INSPIRATION MINES, INCORPORATED

P.O. BOX 1559 CLAYPOOL, ARIZONA 85532

A Subsidiary of Inspiration Resources Corporation

February 4, 1985

U. S. Bureau of Land Management
4765 W. Vegas Drive
P. O. Box 26569
Las Vegas, NV 89126

Attention: Mr. Joseph V. H. Ross

To Whom It May Concern:

In reference to Wilderness Study Area NV-060-0338, "Silver Peak Range", as designated in BLM "Esmeralda-Southern Nye Wilderness Technical Report", of November 1984, this is to advise you that Inspiration Mines Inc. objects to this area being seriously considered for wilderness. Inspiration has an operating mine two miles east of the eastern boundary of WSA NV-060-0338. Quartz veins in this district which carry economic gold and silver are in a mineralized belt about six miles wide in a northwest-southeast direction.

The mineralized veins trend in a general northeast-southwest direction. From the known mines, two miles east of WSA NV-060-0338, most of the local faults in this district trend in a southwest direction for roughly eight miles which is right across the southeast side of the WSA. Economic mineralization is often associated with these faults.

The general geological environment on a large portion of the southeast side of this WSA is quite similar to the geologic environment where the local mines are. Because of that, there may be good chances of finding additional ore deposits in the WSA area.

Please refer to Nevada Bureau of Mines and Geology Bulletin 78, "Geology and Mineral Deposits of Esmeralda County, Nevada" for data and maps relating to the area.

I urge you to disqualify WSA NV-060-0338 as a wilderness area.

Sincerely,

Hugh W. Olmstead

H. W. Olmstead
Chief Exploration Geologist

HWO:sk

Comment Letter 16

WOMEN IN MINING

February 7, 1985

Mr. Kemp Conn, District Manager
Bureau of Land Management
P.O. Box 26569
Las Vegas, Nevada 89126

Dear Mr. Conn,

The following comments concern the Esmerelda-Southern Nye RMP alternatives. After reading the draft alternatives I find that I cannot fully support any alternative, in total. I support the land tenure, corridors, and rangeland management of the Preferred Alternative, however, I am firmly opposed to the Silver Peak Range wilderness designation.

As a member of Women In Mining and a strong supporter of the mining industry, I feel that nearly all public land should be open to mineral entry. Our country as a whole needs the minerals and metals produced to maintain our high standard of living and national security. The state and local economy benefits from the jobs created by the minerals industry. Economic mineral deposits are not convenience items which are available everywhere. A prospector must be given the opportunity to search vast amounts of land to locate the few economic deposits.

I am opposed to all of the Wilderness Study Areas in the management plan. I am especially shocked that large acreages containing moderate to high mineral potential are being knowingly considered for withdrawal. Vast acreages of Nevada will retain suitable wilderness characteristics, due to the desert and mountainous terrain, without a federal wilderness designation. Too much public land, wilderness and otherwise, has already been withdrawn from mineral entry and other multiple uses.

Thank you,

Nancy J. Wotruba

Nancy J. Wotruba, Member
Women In Mining

	Init	Date
DM		
ADM		
PAO		
✓ AD RM		
FM ODFE		
CM ADMS		
AM CRA		
AM CALIENTE		

Battle Mountain Chapter

P.O. Box 1064, Battle Mountain, Nevada 89820

THE WILDERNESS SOCIETY

FOUNDED IN 1935

February 8, 1985

Mr. Kemp Conn
District Manager
Bureau of Land Management
P.O. Box 26569
Las Vegas, NV 89126

Dear Mr. Conn:

Thank you for the opportunity to comment on the Draft RMP/EIS for the Esmeralda-Southern Nye Planning Area.

The Wilderness Society strongly objects to the Preferred Alternative, which would recommend a mere 17,850 acres as wilderness -- only 9.0% of the entire WSA acreage and just .5% of the Planning Area. Considering the glaring scarcity of designated wilderness in Nevada to date, as admitted by BLM in the report, failure to make a stronger wilderness recommendation is inexcusable.

All five areas have already demonstrated their wilderness qualities by being inventoried. All have opportunities for solitude and primitive recreation, many of which are outstanding. The ecosystems in these WSAs -- Pinyon and Juniper woodlands, Great Basin Sagebrush, Saltbrush-Greasewood and Creosote Bush -- are not well represented among designated wilderness areas, as BLM points out. However, BLM's further argument that these ecosystems are well represented among other WSAs which may be recommended for wilderness is a weak and equivocal one.

Non-designation as wilderness would have an adverse impact on primitive and unconfined recreational activities. On the other hand, designation would not only protect these as well as archaelogical and scenic values, but would also benefit cultural resources through protection from surface disturbing activities and vandalism.

The main argument against wilderness designation appears to be mining. Yet, with the exception of Pigeon Spring and a tiny portion of Silver Peak, favorability for minerals and energy ranges from none to moderate in the five areas.

278 POST STREET, #400, SAN FRANCISCO, CA 94108

(415) 982-2795

Comment Letter 17

Considering the tiny portion of the Planning Area that these five WSAs represent, it is difficult to believe that their mineral value can be so high as to preclude all other resource uses, such as wilderness, that are more readily available here than anywhere else in the Planning Area.

GRAPEVINE MOUNTAINS

This WSA boasts a number of wilderness qualities: heavily forested mountains, presenting outstanding opportunities for solitude; a highly dissected and rugged ridgeline; a transitional vegetation zone; colorful scenery; and a mostly natural character. Grapevine Mountains also represents a logical extension of Death Valley National Park, administratively endorsed as suitable for wilderness designation. The southern part of the WSA is completely natural and has the highest wilderness values, including deep colorful canyons and heavily forested ridges. It is imperative this area be protected from surface disturbing activities. We suggest that the entire WSA, with the possible exception of the northern tip, be recommended as wilderness.

PIGEON SPRING

Pigeon Spring features a steep-walled canyon and rolling ridges which both offer outstanding opportunities for solitude. The high point of the ridge is the highest point of the Sylvania Mountains, and offers good views of the White Mountains. Vehicle use potential and poorly defined boundaries are weak reasons to designate this area as not suitable for wilderness designation.

QUEER MOUNTAIN

Most of this WSA is natural. It is large, adjacent to other WSAs (two of which have been recommended as wilderness), and in an area of little development other than historic mining activity. BLM states that "with two exceptions, the WSA is natural ... (and) has outstanding opportunities for solitude because of its large size, blocky configuration, and topographical screening in the mountainous portion." There seems to be no reason not to designate at least the majority of the WSA, with the possible exception of the northern and eastern ends, as suitable for wilderness designation. Most

of the surface disturbance will be in the northern end, not in the entire WSA.

RESTING SPRING

This area is natural with the exception of the road dividing the WSA. There are no manmade intrusions and no to low favorability for any mineral or energy resources. The potential threat of ORV use is insufficient reasoning to recommend this area as non-wilderness. No mention is made of current ORV use, so there is no reason that prohibitive efforts cannot be maintained in the future.

SILVER PEAK RANGE

This "remarkably pristine" area is a prime example of true wilderness, and should be entirely designated as such. Silver Peak Range boasts outstanding opportunities for primitive recreation and solitude, archaelogical and geological resources, numerous springs and outstanding special features. Wilderness designation would protect the pristine and naturally rich area. "Reclusive species such as bighorn, mountain lion and spotted bat would benefit most from reduction in human harassment by vehicular access." Rugged topography, diverse plant communities, abundant wildlife, high scenic quality -- what more does BLM want from a wilderness area?

17-1 The argument presented for non-wilderness designation (that the most significant manageability issue is the difficulty of defining existing boundaries) is ridiculous. Nowhere in the Wilderness Act does the term "easily described boundaries" define wilderness. Not only would surface disturbance in the recommended undesignated area "cause a loss of naturalness and outstanding opportunities for solitude and primitive recreation on the 17,234 undesignated acres," including the remarkably pristine Mud Springs-Blind Spring and Piper Canyon areas, but these activities would adversely impact similar opportunities in the recommended designated area! "Over a prolonged period of time, wilderness characteristics and values may be irretrievably lost as a direct consequence of those acres not being recommended as suitable."

Comment Letter 17

17-2 We must admit to some confusion in the "Rangeland Management" section of the Affected Environment chapter. Why have ranchers expressed concern over "lock-up" of wilderness lands, when no mention of grazing use on the WSAs was mentioned? We would appreciate BLM explaining this further.

17-3 We are also not satisfied with the Environmental Consequences chapter as it refers to the WSAs. Merely citing that "wilderness values would be lost" or that "loss of wilderness values would not be significant because the values at risk do not meet the minimum wilderness criteria" is insufficient description of environmental consequences.

We would only again repeat that wilderness is a sorely lacking resource in the state of Nevada. These five WSAs have demonstrated their wilderness qualities, and should be protected for the enjoyment and appreciation of future as well as present generations. We urge you to seriously reconsider the preferred alternative, and instead adopt Alternative C, or at least a compromise between Alternatives B and C.

Sincerely,

Patricia Hedge

Patricia Hedge
Regional Director, California-Nevada

Jeri Galbraith

Jeri Galbraith
Regional Assistant, California-Nevada

SIERRA CLUB

Toiyabe Chapter – Nevada and Eastern California

February 13, 1985

Mr. Kemp Conn, District Manager
Attn: Esmeralda-So. Nye RMP
Bureau of Land Management
P. O. Box 26569
Las Vegas, NV 89126

Dear Mr. Conn:

We have carefully reviewed the Esmeralda-Southern Nye Planning Area RMP DEIS and have some comments on it for your consideration in preparing the final RMP.

As a general comment, we feel that a great deal of effort and care went into the analyses used in the development of alternatives and impacts expected from them. However, we found problems in selecting any one alternative that satisfied our preference in all issues and elements. Furthermore, we are not in total agreement with certain elements of BLM policy that directed the analyses with respect to some of the identified issues; thus further complicating our comments on the various alternatives and our preference.

It is our feeling that the rangeland management issue is of crucial concern since the long term quality of life is dependent on the land's productivity. We feel that every effort must be taken to achieve and maintain that productivity. We note the general mid and late vegetative status, the low productivity and the resulting rather low response potential of the allotment area as a whole. Still, we are rather concerned that the BLM Preferred Alternative is expected to produce a mere 1% improvement in ecological condition. Considering all the uncertainties in range data, the many assumptions that go into the analyses, etc., it seems that one percent improvement is likely well within the possible range in error of the calculation. It would be quite possible under this plan to end up with a net decrease in overall range quality. The rather large percentage of most allotments for which no trend in ecological status could be determined ("Not Apparent" column of Table 3-2) is one example that suggests this uncertainty. It would seem to us advisable to seek a higher percentage improvement in order to accommodate the possible error.

18-1

If a Preferred Alternative is to seek reasonable numbers of wildlife (which we think it should), a goal of higher percentage

LAS VEGAS GROUP
P.O. Box 19777
Las Vegas, Nevada 89119

To explore, enjoy, and protect the natural mountain scene . . .

GREAT BASIN GROUP
P.O. Box 8096
University Station
Reno, Nevada 89507

Comment Letter 18

improvement will mean downward adjustments in numbers of livestock and/or horses and burros in areas where their grazing areas overlap, in livestock only in some other portions of allotments, and/or changes in AMPs and HMPs that help achieve the same goal. The percentage improvement in ecological condition to be sought as a goal will depend on how large the uncertainty is calculated to be. If high enough, methods approaching those of Alternative B or even C may be necessary as it applies to this issue.

Riparian habitat is, of course, an element of special concern because of its scarcity, its aesthetic appeal, its frequent association with sensitive species and the utilitarian value of its waters. The Preferred Alternative, as it stands, allows 50 streamside acres (about 40% of the total) the possibility of going into a decline. This risk seems undesirable and would be unacceptable under Alternative B. It seems to us that either reduction in burro and/or livestock or improved HMP/AMP is necessary on this acreage. We are also concerned that the 20 acres of non-saline wet meadow (100%) would decline in seral stage under most alternatives. Only some combination of livestock reduction and AMP activity (Alternative B?) can prevent the planning area's scarce non-saline wet meadows from deteriorating.

18-2

For the saline meadows and spring associated riparian habitat, Alternatives B or C offer the best hope for improvement by some combination of AMP/HMP and livestock/horse and burro reduction, and we think this is preferable. We find it difficult to accept that about 330 acres of saline meadows must go into decline by all alternatives, and suggest AMP/HMP or adjustments in numbers be made to reverse this projected loss.

The Las Vegas Group is highly supportive of steps to maintain or improve critical habitat in Ash Meadows, and we believe the HMP for this area should dovetail with U.S. Fish and Wildlife plans for establishing a refuge here.

On the issue of land disposal, we feel it is a good idea to identify lands for eventual disposal or trade where checkerboard or irregular ownership patterns would result in inefficient BLM management. And while we agree to the idea of identifying lands suitable for urban growth, we are not in favor of actual disposal except on an as-needed basis in conjunction with a definite community plan and with a timetable for completion of the development. The Preferred Alternative seems best in meeting

these needs. Care should be taken, however, to avoid land disposals that would negatively impact sensitive species habitat. The Preferred Alternative also seems adequate regarding the designation of utility and planning corridors.

Our Group is especially interested in the designation of well qualifying units of wilderness in the planning area. We are in full agreement with the establishment of wilderness in the Silver Peak Range, but we feel there are excellent reasons for boundaries as outlined in Alternative B. The excellent wilderness attributes of the Silver Peak Range are well described in the Esmeralda-Southern Nye Wilderness Technical Report. Some of the finest wilderness is indeed found in the drainage of Icehouse Canyon and the west slope. These are associated with the long north-south crestline, its steep western slopes, and of course the colorful, well-watered drainage of Icehouse Canyon. The wildlife and wildhorse viewing opportunities here are splendid, and the pastel shadings associated with the volcanics are indeed unusual as well as beautiful.

Our Group conducted a memorable backpack into the headwaters of Icehouse Canyon last spring and can attest to the variety of terrain in the tributaries of the main canyon. We were quite disappointed, however, in not having the time on that trip to explore more than the upper rim of the middle fork of Piper Canyon, where we photographed fine examples of petrified logs and viewed the badlands of the lower canyon. The entire Piper Canyon basin would be a splendid addition to the wilderness system as proposed in Alternative B. This alternative's proposed additions on the east and southeast would add and protect in wilderness these well-forested slopes and the basin containing the scenic and ecologically important Jeff Davis and Blind Springs.

The wilderness values of this enlarged area seem to us to overshadow its mineral potential. The one area on the east classified as highly favorable for metallic minerals occupies but a small portion of the range. Development at this location may well have significant impact on the wildlife and habitat associated with Blind Spring. We find it interesting that no mining activity has historically occurred anywhere within the WSA including this rather accessible and presumably more desirable location. The GEM reports are speculative at best, while the wilderness values found in Alternative B for the Silver Peak Range are certainly high and not in the least speculative. Furthermore, what mineral values exist in the WSA will always be available as long as they are in the ground. Wilderness will not

Comment Letter 18

affect their existence; but, of course, the reverse is not the case since wilderness values are lost forever once mineral development has begun. The changes in the WSA boundary to accommodate an Alternative B proposal would be minimal, would inconvenience no one and are justified in greatly improving the identification of the wilderness boundary on the ground.

The Grapevine Mountains WSA is contiguous with WSA #4 in Death Valley National Monument, which has been administratively endorsed as suitable for wilderness by the National Park Service (NPS). The NPS has indicated their interest in the preservation of the wilderness integrity of the Grapevine Mountains across the BLM/NPS boundary. This seems highly desirable since mineral development immediately to the north on the BLM side of the border (Helmet Peak area) would impact negatively on their dramatically scenic unit. While the BLM Grapevine Mountains unit is the descending end portion of the range, it is nevertheless geologically and ecologically an integral part of the same unit and does exhibit dramatic wilderness appeal in its own right. The speculative moderate mineral potential on the BLM side of the boundary seems to offer insufficient justification for opening this border area to possible damaging impacts of incompatible multiple uses.

Though the Sierra Club does not subscribe to the long-term manageability problems perceived by the BLM to exist on flat bajadas, we feel nevertheless that a mountainous core unit as defined by Alternative B would be a minimum desirable size and configuration in the Grapevines. Intrusion of ORVs on bajadas excluded from wilderness would likely occur over time in the manner of a self-fulfilling prophecy, but it has yet to be demonstrated by the BLM that most ORV drivers would not respect the law by enjoying their form of recreation in places where they are permitted to operate.

The Little Sand Spring WSA on the California side of its border with Nevada has been recommended by the CDCA and endorsed by the Sierra Club for a wilderness unit which would be contiguous with the BLM's Queer Mountain WSA in Nevada. Logic suggests that wilderness should exhibit natural boundaries rather than the straight lines of political subdivisions. Hence, we recommend that the BLM's preference for Queer Mountain should be a wilderness unit no less than that of Alternative B, contingent on the designation of the Little Sand Spring unit in California. The combined units would have enhanced wilderness values over those described for each of the two units separately.

Comment Letter 18

In summary, the Las Vegas Group feels that the Preferred Alternative should strive for an expectancy of improvement in ecological condition great enough to assure that possible errors in the rough data or methods of calculation do not lead to an actual decrease in range quality. We feel that this higher percentage improvement should be achieved by adjustments in stocking levels or horse and burro populations and in AMPs/HMPs in a manner that achieves "reasonable numbers" for the key wildlife species. The Preferred Alternative seems to handle utility corridor designation and planning adequately and provides for potentially desirable land disposals satisfactorily as long as adequate planning for, and timely implementation of, development plans are assured by the local involved entity. For wilderness, we urge a recommendation by the BLM of 33,620 acres for the Silver Peak WSA with boundaries as in Alternative B; 23,150 acres for the Grapevine Mountains WSA, also with boundaries as in Alternative B; and 42,640 acres for Queer Mountain WSA, contingent on the designation of a contiguous Little Sand Spring wilderness in California.

Sincerely,

Howard Booth
Wilderness Chair

Anita Bowen
Conservation Chair

5

Comment Letter 19

Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. L. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

February 11, 1985

Mr. Kemp Conn, District Manager
Bureau of Land Management
Post Office Box 26559
Las Vegas, Nevada 89126

Dear Mr. Conn:

The Wildlife Management Institute is pleased to comment on ESMERALDA-SOUTHERN NYE PLANNING AREA DRAFT RESOURCE MANAGEMENT PLAN and ENVIRONMENTAL IMPACT STATEMENT, NEVADA.

19-1 The plan is not satisfactory for wildlife. The preferred alternative increases livestock grazing by 350 AUM and shows major increases in wildlife numbers, but does not tell us how that increase will be attained. Alternative B, which "...emphasizes wildlife numbers..." shows a decline in mule deer and only modest increases in other wildlife numbers. None of the alternatives offers details on how the wildlife changes will be accomplished.

19-2 There is not enough emphasis on T&E species. Livestock should be controlled or eliminated in all areas of crucial wildlife habitat.

Water is the key habitat element, and it is good that 75 acres of riparian area are to be fenced. But that is not enough; at least 90 percent of all riparian areas in this arid section should be fenced.

19-3 The only alternative that shows maximum wilderness is "C", yet that is the same one that completely eliminates grazing by domestic livestock. Realistically and politically there always will be grazing on the public lands, so inclusion of a no-grazing alternative is a waste of your time in preparing the report and our time in reading it. To tie no-grazing with maximum wilderness is not reasonable. Wilderness will not reduce grazing, and the consolidation of both items in the same alternative is not fair to supporters of wilderness and recreation.

The subsidies to grazing permittees are particularly large in this plan, among the highest we have seen:

Number of allotments --	16
Number of "I" allotments --	6
Cost of proposed range developments --	$508,735
Average subsidy per allotment --	$ 26,776
Average subsidy per "I" allotment --	$ 84,789

DEDICATED TO WILDLIFE SINCE 1911

Comment Letter 19

Some specific comments follow:

19-4 Page i. Wildlife is only mentioned in the issues once, and then as the last two words of the last issue.

Page 7, right column, 2nd paragraph. "The preferred alternative will strive to maintain or improve range conditions..." It seems to us that the preferred alternative would improve conditions. Striving is great, but it is not worth the more than $508,000 in range developments.

19-5 Page 9, last paragraph. Roads only will avoid riparian area "to the extent practical," and riparian areas only will be improved "where possible." This language is unacceptable.

Page 18. Only 9 percent of the WSA's are recommended for inclusion in the wilderness system. This is far too low, and it illustrates the plan's commodity emphasis

19-6 Page 33. It is good to list the State of Nevada's Reasonable Wildlife Numbers and their population estimates. BLM also needs to set up its own goals or to adopt the state goals in total.

19-7 Page 92. The land scheduled for disposal in the preferred alternative contains aquatic and stream bank habitat. Disposal of this kind of land is questionable any place. It is especially unacceptable in arid areas.

19-8 Pages 93-94. The plan should do better on riparian management.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

DAP:dt

Comment Letter 20

FROM: WALTER BARBUCK
4050 Palos Verdes, Apt 19
Las Vegas, Nv 89119

TO: Mr Kemp Conn Feb 19, 1985
District Manager
Attn: Esmeralda-S. Nye RMP

SUBJECT: Comments regarding above

I am Saddened that the BLM in it's draft EIS for Esmeralda-Southern Nye only found fit to recommend 9% of the total W.S.A.'s for designation. Included is the preferred alternative of only 53% of Silver Peak which is the entire BLM recommendation. Adapting the "B" alternative will add the dense forested areas of the eastern slopes of Silver Peak which are classified as outstanding in the vegative screening catagory. The boundries of this WSA would easily be identtifiable on the ground. Under the preferred alternative using the Bailey-Kuchler system for diversity, Juniper-Pinyon woodlands in the entire WSA would be grossly unrepresented. This should be noted because while all of the Esmeralda ecosystem is represented in the National Wilderness Preservation System, it is only to a minor degree. The entire Silver Peak Wilderness Study Area is remarkably prestine with topographic screening outstanding throughout except for the flat summit ridge. The spotted bat classified "rare" by Nevada and sensitive by the BLM may also inhabit the WSA. Petrified wood has been found in Icehouse Canyon. A source of obsidian etc indicates a high favorability for prehistoric resources.

The "B" alternative is recommended for Grapevine Mountains WSA. The National Park Service feels designation in the north end of the range would complement, protect and provide general integrity for their own proposed wilderness within adjacent Death Valley National Monument. Again Pinyon-Juniper woodlands in various densities occur in the south end of the range. Topographic screening is outstanding in the mountainous portion (B) of the WSA.

The California Desert Conservation Area has recommended that Little Sands Springs be afforded wilderness. The Park Service has also endorsed their area for Wilderness. Queer Mountain contiguous to the above is felt to be remarkably presting. Blocky configuration and mountainous terrain offers outstanding opportunities for solitude. The "B" alternative would provide a logical addition contingent upon Little Sand Springs WSA achieving designation.

-1-

Comment Letter 20

In consulting Summary Tables # 1 and 2 of the Esmeralda-Southern Nye Planning Area Draft, with the exception of the Wilderness issue discussed in above paragraphs, I am reasonably happy with the BLM in the stance taken on the issues mentioned and enviormental components broken down. There is give and take in which all interested parties should be able to live with. As a last comment I hope all riparian zone losses, if any, could be kept to an absolute minimum and improved, without mans imprint, wherever possible

Sincerely

WALTER BARBUCK
member
Sierra Club

-2-

Comment Letter 21

February 14, 1985

Nevada Bureau of Land Management;

I am writing in support of wilderness recomendations for Grapevine Mountains WSA (66,800 acres), Queer Mountain WSA (81,550 acres) and the Silver Peak Range WSA (35,000 acres). All three areas clearly qualify for wilderness designation. The Graprvine and Queer Mountain WSAs are important and logical exentions of the Death Valley wilderness complex and should be protected. None of these areas have significant resource conflicts; wilderness is the best and most logical use for these areas. Becauseof the Silver Peaks Range's outstanding wilderness qualities and its importance to large herds of bighorn sheep and wild horses, the maximum acreage should be recomended for wilderness.

This letter is in support of the Sierra Clubs effort to save wilderness for prosperity and the children of our nation.

Sincerely,

Joseph A. Viscuglia
Joseph A. Viscuglia

Mary Viscuglia
Mary Viscuglia

Comment Letter 22

STATE OF NEVADA

RICHARD H. BRYAN
Governor

LINDA A. RYAN
Director

STATE OFFICE OF COMMUNITY SERVICES
Capitol Complex
Carson City, Nevada 89710
(702) 885-4420

February 19, 1985

Edward F. Spang
State Director
Bureau of Land Management
P.O. Box 12000
Reno, Nevada 89520

Re: SAI NV #85300025 Project: [redacted]
Planning Area, RMP/DEIS

Dear Mr. Spang:

The Nevada State Clearinghouse has concluded the review of the above mentioned Draft RMP/EIS. Enclosed is the Governor's Consensus Position on the wilderness portions of the Draft Plan. Also enclosed are Clearinghouse comments prepared by the Nevada Departments of Agriculture, Transportation, Wildlife, Minerals, and Conservation and Natural Resources -- Divisions of State Lands, Historic Preservation/Archeology and Forestry.

Sincerely,

John B. Walker

John B. Walker, Coordinator
State Clearinghouse, OCS/SPOC

JBW/ll
cc: Kemp Conn, BLM-Las Vegas
Commenting State Agencies
Enclosures

Comment Letter 22

STATE OF NEVADA

RICHARD H. BRYAN
Governor

LINDA A. RYAN
Director

STATE OFFICE OF COMMUNITY SERVICES
Capitol Complex
Carson City, Nevada 89710
(702) 885-4420

February 19, 1985

Edward F. Spang
State Director
Bureau of Land Management
P.O. Box 12000
Reno, Nevada 89520

Re: SAI NV #85300025 Project: Governor's Consensus Position

Dear Mr. Spang:

Thank you for providing the Draft Esmeralda-Southern Nye Planning Area Resource Management Plan and Environmental Impact Statement for our review and comment. The Resource Management Plan deals with a variety of issues and uses relating to the Bureau of Land Management lands within the planning area; however, at this time, this comment is specifically on the wilderness study areas considered in the document.

You may have already received comments from various state agencies representing their specific concerns with each area. I hope you find these helpful and informative. Because the various state agencies are given different mandates and have different concerns, their evaluations and comments may understandably vary.

The Governor has asked the various state agencies to work with the State Clearinghouse to develop a consensus position for the wilderness study areas in the Esmeralda-Southern Nye County Planning Area. These agencies were the State Departments of Agriculture, Conservation and Natural Resources, Minerals, and Wildlife. The State's position is based upon information provided by the Bureau of Land Management, the State's knowledge of the resources and attributes of each area, the concerns expressed by local government officials and concerns presented by the general public.

Comment Letter 22

The consensus developed by the state agencies, in which the Governor concurs, is as follows:

Pigeon Spring (NV-060-0350), Queer Mountain (NV-060-0354), Grapevine Mountains (NV-060-0355), and Resting Springs Range (NV-050-0460): The State supports the preferred alternative which proposes no wilderness for all four areas. These areas all lack significant wilderness attributes such as outstanding scenic quality, primitive recreational opportunities or opportunity for solitude. Two of the areas, Resting Springs Range and Pigeon Spring, in addition to lacking wilderness characteristics, are too small in size to warrant further consideration. Mineral potential in both the Grapevine Mountains and Queer Mountain wilderness study areas are significant enough also to disqualify these areas.

Silver Peak Range (NV-060-338): The State feels strongly that this wilderness study area should not be recommended for further wilderness consideration. This is an area which has significant mineral resource potential. Mineral claims exist within portions of the area under consideration with active mining occurring just outside the study area boundary. A formation now being actively mined extends into the wilderness study area and is indicated on your maps as "high favorability" for metallic resources.

The Silver Peak Range is an important bighorn sheep habitat area. Concerns have been expressed regarding the incompatibility of wilderness designation with the use of the range as a wild horse management unit. Wilderness designation could seriously hamper wild horse management, in turn jeopardizing the bighorn sheep resource in the area.

We additionally note the Esmeralda County Commission opposes designation of this wilderness area.

Because of the resource conflicts, local government concerns, and limited wilderness qualities, the State urges you to drop the Silver Peak Range from further consideration as wilderness.

Please do not hesitate to contact us if you need additional information.

Sincerely,

Linda A. Ryan
Director

LAR/ll

Comment Letter 22

STATE CLEARINGHOUSE

OFFICE OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 109
CARSON CITY, NEVADA 89710
(702) 885-4420

TO:

__ Governor's Office	__ Labor Commission	Conservation and Natural Resources
__ Attorney General	X Legislative Counsel Bureau	
__ Administration	__ Library	
X Agriculture	__ Prisons	X State Lands
__ Commerce	__ Public Service Commission	__ Conservation Districts
__ Community Services	__ Taxation	__ Environmental Protection
__ State Job Training Office	X Transportation	X Forestry
__ Economic Development	X UNR-Bureau of Mines	X Hist. Preservation & Archeology
__ Education	X UNR-Dept. of Range, Wildlife, and Forestry	XX State Parks
__ Employment Security Department	XX Wildlife	X Water Planning
X Dept. of Minerals	__ Press Room-Capitol Building	__ Water Resources
__ Equal Rights Commission	__ Nuclear Waste Project Office	
__ Human Resources	__ _____	
__ Indian Commission	__ _____	

FROM: Linda A. Ryan, Director

SAI NV # 85300025 PROJECT: Esmeralda, Draft RMP/EIS

Attached for review and comment is a copy of the aforementioned project. Please evaluate it with respect to:

1) the program's effect on your plans and programs;
2) the importance of its contribution to State and/or areawide goals and objectives;
3) its accord with any applicable law, order or regulation with which you are familiar and/or
4) additional considerations.

PLEASE SUBMIT YOUR COMMENTS NO LATER THAN 2/26/85. Write out your comments if applicable, check the appropriate box below and return the form to this office. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT on this particular project so that we may complete our processing. If you are unable to comment by the prescribed date, please notify this office immediately.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

__ No comment on this project	__ Conference desired (see below)
__ Proposal supported as written	__ Conditional support (outlined below)
X Additional information (see below)	__ Disapproval/denial of funding (must specify reason below)

Comments: (use additional sheets if necessary)

Please see attachments

Thomas E. Smigel — Reviewer's Signature
Regional Coordinator — Title
386-5256 — Phone
2-5-85 — Date

Sometimes we tend to overlook, amongst the myriad of users of public land, the producers. Agriculture is one of the users and producers and should be acknowledged in that the management of public lands be such that it allow maximum production with minimum impact.

Therefore, the Department of Agriculture, supports alternative A, but with the following comments:

Wilderness designations bring with them certain constraints to the agriculture producer, which cause an extreme hardship. As an example, available water and its development and maintenance, is very important to the success of a grazing operation. Enclosed are Resolutions #14 and #16 (see attachments). The provisions listed should be incorporated into your use plans for all public lands in Nevada.

Your term "disposal" in regard to public lands is particularly objectionable. It is time, that when finding other uses of public lands, that the Green Belt concept be incorporated, which would allow for agriculture production, recreation and adequate floodways in our communities.

The Southern part of Nevada is facing continued growth and the possibility of a major industry (a nuclear repository) being developed. Establishing utility corridors now is prudent. However, this development should include the promulgation of liability responsibilities to corridor users (see Resolution #6). The additional roads and railroads should be constructed for maximum safety to the public and agricultural producers. For example, railroad bridges instead of crossings, fences where appropriate, etc.

22-1 In lieu of present trends in the reduction of Federal programs and services, is there an assurance that intensive management can be achieved with the necessary monitoring of the range to insure proper utilization? What base line data is available on these areas? How complete are these studies? Where can they be reviewed by the Department (also see Resolution #12)?

Management of wild horse and burro populations presents, at times, an emotional reaction from concerned parties. The Department supports the free market concept with use of excess production resulting in sustained and predictable production (see Resolution #15).

Comment Letter 22

It has been my experience that agriculture producers are willing to compromise use patterns in favor of big game and wildlife habitat requirements. Local CRMP committees have delineated grazing strategies and the curtailment of certain kinds of livestock in order to better the range for all concerned. Range trades, etc., should be considered for the reintroduction of sensitive species.

Ash Meadows is one of the most biologically important and unique in Southern Nevada. Continued management practices should be limited to biological controls and this site would be a good location for a research station for all monitoring activities and environmental assessments of the public lands in Southern Nevada.

A positive and constructive approach to the use of public lands is possible with communication and arbitration. Let's maintain the "American Dream" in agriculture and, in particular, in Nevada agriculture.

Attachments:

Resolutions #6, 12, 14, 15 and 16, adopted at the Joint Convention of the NV Cattlemen's Association and NV Wool Growers Association, in Winnemucca, NV on November 14, 1984.

Comment Letter 22

STATE CLEARINGHOUSE

OFFICE OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 109
CARSON CITY, NEVADA 89710
(702) 885-4420

TO:

- __ Governor's Office
- __ Attorney General
- __ Administration
- X Agriculture
- __ Commerce
- __ Community Services
- __ State Job Training Office
- __ Economic Development
- __ Education
- __ Employment Security Department
- X Dept. of Minerals
- __ Equal Rights Commission
- __ Human Resources
- __ Indian Commission
- __ Labor Commission
- X Legislative Counsel Bureau
- __ Library
- __ Prisons
- __ Public Service Commission
- __ Taxation
- X Transportation
- X UNR-Bureau of Mines
- X UNR-Dept. of Range, Wildlife, and Forestry
- XX Wildlife
- __ Press Room-Capitol Building
- __ Nuclear Waste Project Office
- __ _____
- __ _____

Conservation and Natural Resources

- X State Lands
- __ Conservation Districts
- __ Environmental Protection
- X Forestry
- X Hist. Preservation & Archeology
- XX State Parks
- X Water Planning
- __ Water Resources

FROM: Linda A. Ryan, Director

SAI NV # 85300025 PROJECT: Esmeralda DEIS, Wilderness Technical Report

Attached for review and comment is a copy of the aforementioned project. Please evaluate it with respect to:
1) the program's effect on your plans and programs;
2) the importance of its contribution to State and/or areawide goals and objectives;
3) its accord with any applicable law, order or regulation with which you are familiar and/or
4) additional considerations.

PLEASE SUBMIT YOUR COMMENTS NO LATER THAN 2/26/85. Write out your comments if applicable, check the appropriate box below and return the form to this office. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT on this particular project so that we may complete our processing. If you are unable to comment by the prescribed date, please notify this office immediately.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

- __ No comment on this project
- __ Proposal supported as written
- X Additional information (see below)
- __ Conference desired (see below)
- __ Conditional support (outlined below)
- __ Disapproval/denial of funding (must specify reason below)

Comments: (use additional sheets if necessary)

Attached: Resolution No. 14 issued by NV Cattlemen's Assoc. and NV Wool Growers Assoc. at their Joint Convention November 14, 1984.

The NV Dept. of Agriculture supports resolution No. 14 and encourages the consideration and incorporation of the specific points of the resolution into your Wilderness Area Plans.

Thomas E Smigel — Reviewer's Signature
Regional Coordinator — Title
386-5256 — Phone
2-4-85 — Date

Comment Letter 22

RESOLUTION NO. 6
NvCA Brand and [illegible]rt Committee
(Amendment 1983 Resolution)

NEVADA CATTLEMEN'S ASSOCIATION AND
NEVADA WOOL GROWERS ASSOCIATION
JOINT CONVENTION
Winnemucca, Nevada
November 14, 1984

WHEREAS, owners of livestock killed by trains are still having trouble regarding payment for animals and brand inspection payments;

WHEREAS, mandatory brand inspection is not required by Nevada Revised Statutes;

NOW, THEREFORE, BE IT RESOLVED, that the Nevada Cattlemen's and Nevada Wool Growers Associations request that a law be enacted to require all railroads to have any animal killed brand inspected for proof of ownership and estimated value, and payment made for brand inspection services and indemnification of owner within 90 days after the kill.

Directed to: All Railroad Companies operating in Nevada
Office of the Nevada Attorney General
County Offices of the District Attorney
Brand Division, Nevada Department of Agriculture
Legislative Council Bureau
Agriculture Committee, Nevada Assembly
Natural Resources Committee, Nevada Senate

Comment Letter 22

RESOLUTION NO. 12
Public Lands and Forest
(Reviewed from 1981)

NEVADA CATTLEMEN'S ASSOCIATION AND
NEVADA WOOL GROWERS ASSOCIATION
JOINT CONVENTION
Winnemucca, Nevada
November 14, 1984

WHEREAS, misunderstanding may be generated between inexperienced "Range Conservationists" and ranchers; therefore be it

RESOLVED: That "Range Conservationists" receive at least one year of practical, supervised range experience in that locale, excepting cases of experience in other, similar geographic districts.

Directed to: Bureau of Land Management
U. S. Forest Service

Comment Letter 22

RESOLUTION NO. 14
NvCA Public Lands and Forest

NEVADA CATTLEMEN'S ASSOCIATION AND
NEVADA WOOL GROWERS ASSOCIATION
JOINT CONVENTION
Winnemucca, Nevada
November 14, 1984

WHEREAS, the Nevada Cattlemen's and Nevada Wool Growers Associations support the concept of a limited amount of wilderness, however be it

RESOLVED: That the Nevada Cattlemen's and Nevada Wool Growers Associations do not support future wilderness areas until such language is developed that includes, but is not limited to:

1. Recognition of state water rights
2. Establisment of the use of pesticides and herbicides as management tools
3. Provision for the release of lands for strategic mineral development
4. Provision for the use of traditional predatory animal control methods,
5. Authorization for the timely use of motorized-mechanized equipment for such use as livestock management, range development, fence maintenance and predator control
6. No allowance for Buffer Zones around the wilderness areas
7. Provision for increased grazing whenever range conditions allow

Directed to: Nevada Congressional Delegation
Secretary of Interior
Secretary of Agriculture
National Cattlemen's Association
National Wool Growers Association
Nevada Legislative Council
Governor Richard Bryan

Comment Letter 22

RESOLUTION NO. 15
NvCA Public Lands and Forest

NEVADA CATTLEMEN'S ASSOCIATION AND
NEVADA WOOL GROWERS ASSOCIATION
JOINT CONVENTION
Winnemucca, Nevada
November 14, 1984

WHEREAS, The Wild Free Roaming Horse and Burro Act states that wild horses and burros must be limited to areas of use as of December 15, 1971, and

WHEREAS, the lack of horse management by the Bureau of Land Management has caused the horses to move into many areas not used by them in 1971, and

WHEREAS, The only way to comply with the wild horse law and keep horses in ues areas of 1971 is to keep the horse numbers at the 1971 level, and

WHEREAS, present disposal methods of excess horses are obviously not adequate to handle the number of excess horses on the public land; therefore be it

RESOLVED: That the horse and burro numbers be held at, or below, the 1971 level of unclaimed horses and that they be restricted to the 1971 areas of use, and be it further

RESOLVED: That the Bureau of Land Management be given sale authority for the disposal of excess horses.

Directed to: U. S. Department of Interior
Bureau of Land Management
U. S. Forest Service
Nevada Congressional Delegation

Comment Letter 22

RESOLUTION NO 6
Public Lands & Forest

NEVADA CATTLEMEN'S ASSOCIATION AND
NEVADA WOOL GROWERS ASSOCIATION
JOINT CONVENTION
Winnemucca, Nevada
November 14, 1984

WHEREAS, Section 4 of the Taylor Grazing Act states: "Fences, wells reservoirs, and other improvements necessary to the care and management of the permitted livestock may be constructed on the public land with such grazing districts under permit issued by the authority of the Secretary," and

WHEREAS, 43 CFR 4120.6(c), amended as 4120.3-3(c), provides: "The use by livestock of stock ponds or wells authorized by a range improvement permit shall be controlled by the grazing permittee or licensee holding the range improvement permit;" therefore be it

RESOLVED: That the Nevada Cattlemen's and Nevada Wool Growers Associations urge that no mitigating measures be used to destroy or hinder the original intent of the Section 4 permit.

Directed to: Department of Interior
Nevada Congressional Delegation

NEVADA DEPARTMENT OF TRANSPORTATION

A. E. STONE
Director

TRANSPORTATION BOARD
RICHARD H. BRYAN, Governor, Chairman
BRIAN McKAY, Attorney General
DARREL R. DAINES, State Controller

STATE OF NEVADA
DEPARTMENT OF TRANSPORTATION
1263 SOUTH STEWART STREET
CARSON CITY, NEVADA 89712

December 6, 1984

IN REPLY REFER TO

PSD 7.19

John Walker, Senior Planner
State Clearinghouse Review
Office of Community Services
1100 East William Street, Suite 109
Carson City, Nevada 89710

Dear John:

The Nevada Department of Transportation has reviewed the scoping document for SAI NV 85300025 - Esmeralda Draft RMP/EIS w/ Wilderness Technical Report.

The Grapevine Mountain Wilderness study area currently contains four material sites (the report states only two) within its boundaries. These sites (identified as: NEV-004469/NV-004472/N-2386/NEV-004470) have been deemed essential to the Department by our Right-Of-Way and Materials and Testing Divisions. Lack of similar sites in the area requires that the Department retain said lands.

22-2 Therefore, we recommend that the Bureau of Land Managedment alter the west boundary of the Grapevine Mountain WSA to exclude the sites or proceed with the no action alternative in respect to this WSA.

Thank you for the opportunity to review this project.

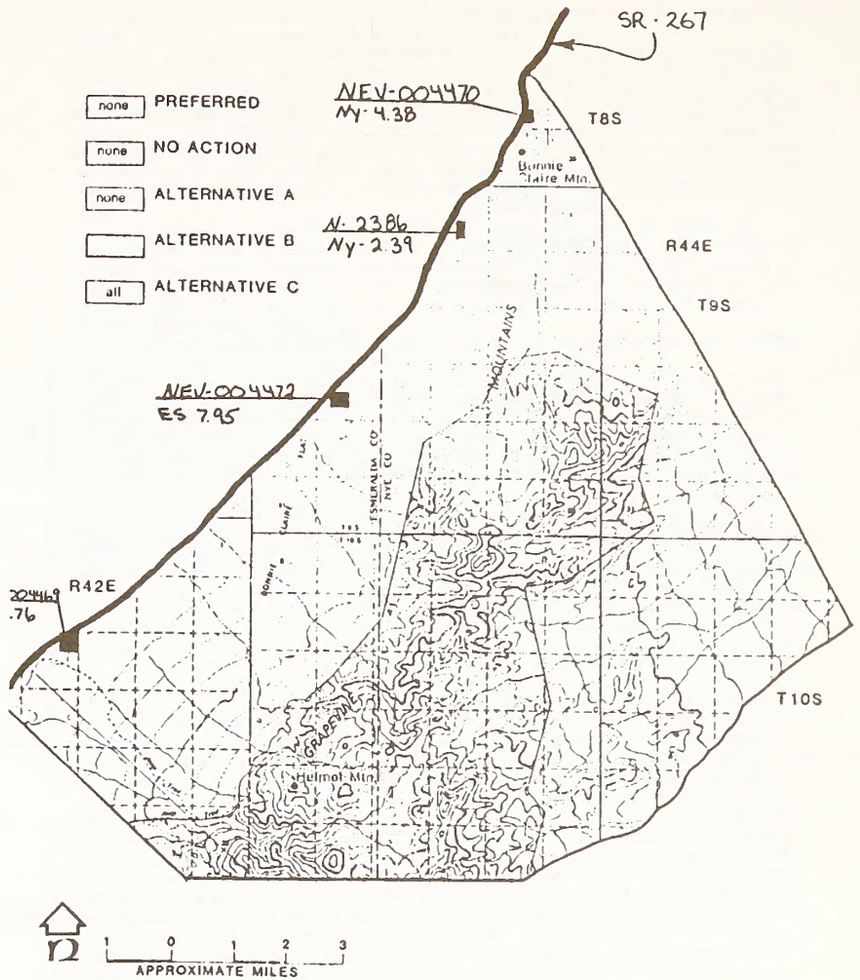
Sincerely,

DENNIS O. BARRY
Assistant Director
Planning

DOB:JRW:bb

Attachment

Comment Letter 22



WILDERNESS ALTERNATIVES
GRAPEVINE MOUNTAIN 060-355

Comment Letter 22

STATE OF NEVADA
DEPARTMENT OF WILDLIFE
1100 Valley Road
P.O. Box 10678
Reno, Nevada 89520-0022
(702) 789-0500

RICHARD H. BRYAN
Governor

WILLIAM A. MOLINI
Director

RECEIVED ON
FEB 08 1985
OFFICE OF
COMMUNITY SERVICES

February 5, 1985

Ms. Linda A. Ryan, Director
Office of Community Services
State Clearinghouse
1100 East William, Suite 109
Carson City, NV 89710

Dear Linda:

We appreciate the opportunity to review and provide comment on the Esmeralda OEIS and associated Wilderness Technical Report (SAI NV #85300025) which was prepared by the Las Vegas Oistrict of the Bureau of Land Management.

As mentioned in previous correspondence during earlier phases nf the planning process, our agency believes that recreational values within the study area should receive high priority consideration. Although Esmeralda County does not represent a large fish and wildlife resource base, it does provide a major potential in the development of recreational values for southwestern Nevada. Based upon our agency's input report to the BLM in October of 1983 and using the USFS figure of $17.85 per user day, for example, the fisheries resource of Esmeralda County was worth some $70,703 in 1982 alone.

22-3 Our agency supports the proposed action fnr the Grapevine, Pigeon Spring, Queer Mountain, and Resting Spring WSA's since these areas do not contain high wilderness values and would best be managed under existing multiple use oriented mandates. Our agency does nnt agree with the proposed actinn for the Silver Peak Range even though the described area does have some significant wilderness values. It is our belief that wilderness designation is not compatible with management strategies proposed for wild horse use in the area. We would suggest that the area be managed under the principles of multiple use management with emphasis on improvements for the bighorn sheep resource. Proper planning should include reductinn of wild horse numbers in addition to development and/or maintenance of primary water sources.

Comment Letter 22

22-4 One major concern associated with the proposed action in the RMP relates to the emphasis on wild horse management, particularly in those areas where potential and documented wildlife conflicts occur. Because of the classification of bighorn sheep as a sensitive species, and because desert sheep are limited by habitat requirements, we would suggest that the Silver Peak Range, Lone Mountain, and Stonewall Mountain be protected from wild horse use in the interest of the bighorn sheep resource. Stated very simply, wild horses can survive throughout most of Esmeralda County, whereas bighorn sheep are extremely limited to specific areas. Conflicts between wild horses and bighorn sheep on the Silver Peak Range were first identified in an approved habitat management plan in 1970.

22-5 Our agency also has a concern with the proposal to initiate grazing in the vicinity of Emigrant Peak since this area has been closed to grazinq for a considerable number of years. Again, with reference to the approved HMP, this area was recommended for nonuse, a management decision we continue to support.

22-6 As noted on page 57 of the draft document, approximately 70 percent of the RMP area is grazed yearlong, a practice which is not in the best interest of the basic land resources. We would suggest that implementation of some type of grazing system be a high priority in the planning process in order to protect soils, watershed, natural vegetation, and other important resources. The same comments would also apply for riparian protection which, according to comments found on page 46, are also overgrazed. Riparian areas are particularly important in Esmeralda County since the scarcity of such zones increases their importance for wildlife.

22-7 While our agency certainly suppnrts the land disposal program as related to needs for community expansion and/or agricultural development, we question whether ample water is currently available for further development of the parcels proposed for disposal in the Pahrump Valley area. We wnuld, therefore suggest that the land disposal program take into careful consideration water availability.

If you have any questions on the above or feel a need for further input at this time, please advise.

Sincerely,

Willie

William A. Molini
Director

RPM:pw

cc: Region III

RICHARD H. BRYAN
Governor

STATE OF NEVADA

RICHARD L. REYBURN
Director

DEPARTMENT OF MINERALS
400 W. King Street, Suite 106
Carson City, Nevada 89710
(702) 885-5050

February 7, 1985

KEMP CONN
Las Vegas District Manager
Bureau of Land Management
P O Box 26569
Las Vegas, NV 89126

The Department of Minerals appreciates the opportunity to respond to the Esmeralda Draft Resource Management Plan and Environmental Impact Statement, SAI NV #85300025.

The Department of Minerals supports the BLM's preferred alternative for the Grapevine Mountain, Pigeon Spring, Queer Mountain and Resting Springs WSA's which are recommended as nonsuitable for wilderness designation. For the Silver Peak Range WSA, however, the Department of Minerals strongly recommends the "no action" alternative.

Mineral potential for each WSA is described as follows:

GRAPEVINE MOUNTAINS

WSA NV# 060-0355

This area concerns 66,800 acres along the Nevada-California border in southern Esmeralda and Nye Counties.

Most of the WSA is covered with Tertiary volcanics; rhyolites, dacites, andesites, and the Timber Mountain tuff. Pre-cambrian and Paleozoic sediments intruded by Jurassic quartz monzonite are believed to underlie the volcanics. Quaternary alluvium covers the valley portions of the WSA. The older sediments have the most potential for hosting mineral deposits, particularly along the intrusive contact. Some of these older sediments may be exposed by faulting in the southwestern part of the WSA.

The closest mineral producing area is eight miles northwest of the WSA in the Gold Mountain District. About $4,000 in gold was produced there. There are no known patented claims in the WSA, the nearest ones being in the Gold Mountain District. In the southwestern part of the WSA are 41 acres of pre-FLPMA claims and 1,154 acres of post-FLPMA claims.

Sand and gravel deposits have been used by the state Highway Department at two sites. There are no known uranium deposits, or oil and gas deposits. There are no known geothermal deposits; however, the deep seated faults in the southwestern part of the WSA indicate a moderate potential for geothermal development.

Comment Letter 22

PIGEON SPRING

WSA NV# 050-0350

This area concerns 3,575 acres along the Nevada-California border about 30 miles southeast of Dyer in Esmeralda County.

The oldest rocks in the WSA are a series of conformable sedimentary formations ranging from late Pre-Cambrian to Ordovician. The oldest unit is the Wyman Formation, a hornfelsed siltstone with thin limestone interbeds. Overlying the Wyman is the Reed Dolomite, a potential host for talc deposits. These Pre-Cambrian and Paleozoic sediments have been intruded by the Jurassic Sylvania pluton, a large body of quartz monzonite. A band of Tertiary olivine basalt overlies the sediments and intrusive. A narrow band of Quaternary alluvium is found in the south and east edges of the WSA.

Just north of the WSA is the Sylvania mine and several prospects. The Sylvania mine has produced lead-silver from deposits at the contact between the Wyman Formation and the Jurassic intrusive. Various washes, especially the one that runs due north through sections 19,18 and 7, T. 6 S., R. 39 E., have been placered, indicating the possibility of a gold source in the Wyman Formation in the WSA.

The Les Brown molybdenum prospect is in the southwest part of the WSA. East of the WSA is the Cucomungo molybdenum prospect.

More than 200,000 tons of talc have been produced from the Sylvania and Palmetto districts north of the WSA. The Amry fluorite prospect is about one mile east of the WSA.

There are patented claims north of the WSA in the Sylvania district and south of the WSA in California. Numerous unpatented placer claims surround the WSA and some extend into the northeast corner of the WSA.

There are no known uranium, thorium, oil or gas deposits in or near the WSA. There are no known geothermal deposits in the WSA; however, deep seated normal faults and the presence of young volcanics indicate a possible environment for geothermal resources.

QUEER MOUNTAIN

WSA NV# 060-0354

This area concerns 81,550 acres along the Nevada-California border in southern Esmeralda County.

Pre-cambrian and Paleozoic sediments, intruded by Jurassic quartz monzonite are exposed in the northwestern portion of the WSA. The rest of the WSA is covered with Tertiary volcanics or Quaternary alluvium. The oldest rock unit in the WSA is the Wyman Formation, which is mostly siltstone with some interbeds of limestone. The Wyman is overlain by the Reed Dolomite which is exposed northeast of the WSA by Gold Mountain. The Jurassic intrusive (Sylvania pluton) is widely exposed in the northern half of the WSA. Mineralization in the area is thought to be related to this period of intrusions. The Tertiary rocks are mainly rhyolite flows with some dacite and andesite. Overlying these is the Pliocene Timber Mountain Tuff which covers a great deal of the WSA.

In the north central part of the WSA is the southern part of the Gold Mountain or Tokop District. Gold veins occur here in the intrusive rocks next to the metamorphosed Pre-cambrian sediments. The Gold Mountain District has a recorded production of $4,000 in gold as well as a small quantity of tungsten. Six miles north of Gold Mountain is the Hornsilver (Gold Point) District which probably produced about $1 million in gold and silver (about $10 million at modern prices).

In the north central part of the WSA are several prospects and one shaft which indicate mineral potential. Near the northwest point of the WSA are several silver prospects around which the WSA boundary was apparently drawn to exclude them from the WSA. No other prospects are known within the WSA; however, small mines and prospects are found to the north where Paleozoic sediments and Jurassic intrusives are exposed.

There are patented claims in the Gold Mountain Oistrict, some very close to the WSA. There are many unpatented claims in the area, with one group extending southward a few miles into the northern part of the WSA. Near the eastern point of the WSA are a couple of claims very close to the WSA boundary.

There are no known nonmetallic mineral deposits in or near the WSA. There are no known uranium or thorium deposits in the WSA, but some radioactive occurrences exist in the Wyman Formation or intrusive rocks in and near the northern boundary of the WSA.

There are no known oil or gas deposits, exploration wells, or federal oil and gas leases in or near the WSA. There are no known geothermal deposits in the WSA; however, the whole area has a moderate potential for geothermal development.

RESTING SPRINGS RANGE

WSA NV# D5D-D460

This area concerns 3,850 acres along the California-Nevada border, 10 miles west of Pahrump in Nye County.

The oldest exposed rock is the Pre-Cambrian Stirling Quartzite. Overlying this is the Lower Cambrian Wood Canyon Formation: quartzitic sandstone, siltstone, micacesus shale and marble. Next is a series of interbedded limestones and shales with some dolomite extending through Devonian time. Ouring the Miocene, tuffaceous lake beds with conglomerate, sandstone, siltstone, ash fall and ash flow tuffs were deposited. Unconformably overlying this are Pliocene (?) Pleistocene (?) fanglomerates and Quaternary alluvium.

There are no known mineral deposits, prospects, or occurrences within the WSA. There are no known patented or unpatented claims within the WSA. The geology, however, is somewhat favorable for gold occurrences. In several districts of southern Nye County, gold is disseminated in dolomite beds within the Stirling Quartzite. In the Johnnie Oistrict (15 miles northeast of the WSA) gold bearing veins are in the Zabriske Quartzite and underlying dolomite beds near the top of the Wood Canyon Formation. Both the Stirling Quartzite and Wood Canyon Formation are in the WSA.

Zeolites are mined by Anaconda a short distance north of the WSA in Miocene tuffaceous lake beds similar to those found in the WSA.

There are no known uranium or thorium deposits, prospects or claims in or near the WSA. No oil and gas deposits, seeps or exploration wells are known to be present. There are a few oil and gas leases in the valley areas around the WSA but not in it. There are no known geothermal deposits within the WSA, but there is a narrow belt of low temperature wells and springs north of the WSA.

Comment Letter 22

SILVER PEAK

WSA NV# D5O-033B

This area concerns 33,900 acres west of Silver Peak in Esmeralda County, Nevada. It covers most of the Silver Peak Range.

The WSA is surrounded by three mining districts: the Red Mountain District, the Mineral Ridge District to the northeast and the Dyer Oistrict to the west. The Red Mountain Oistrict and Mineral Ridge Oistrict are especially rich in silver and associated gold mineralization.

The oldest rock exposed is the Pre-Cambrian - Cambrian Campito formation, a massive quartzite. This is followed by the Poleta (carbonate) formation,the Harkless (silstone) formation, the Mule Spring Limestone, the Emigrant (claystone) formation and the Ordovician Palmetto formation which consists of black shale with chert, limestone and quartzite. Although not exposed in the WSA, the Pre-Cambrian Wyman formation, a siltstone with limestone interbeds, undoubtedly underlies at least the north central and northwest parts of the WSA.

A period of Tertiary volcanism deposited a series of porphyritic latites, rhyolitic flows, domes, breccias, airfall tuffs and intrusive masses. Near the end of this period of volcanism, the magma chamber collapsed to form the Silver Peak caldera, which is about four miles wide and eight miles long. Fluids released after volcanism ceased deposited the silver-bearing quartz veins of the Red Mountain district, and there are indications that similar mineralization is very close to the WSA or even within it.

Previous mineral production has come mainly from the Mineral Ridge and Red Mountain districts, immediately northeast of the WSA. The Mineral Ridge district produced about $13 million in gold during the 1860s, 1870s and 1930s which would be worth about $200 million at modern prices. The Red Mountain district produced about $3 million in the late 1930s which would be worth about $30 million at modern prices. There are records of three major productive mines in the area: the 16-to-1, the Mohawk and the Nivloc. Several other small mines and prospects exist in the area as well. The 16-to-1 mine, currently operating, has reserves of 1.1 million tons grading at 0.035 ounces gold/ton and eight ounces silver/ton according to published reports. The Mohawk mine has seven targets possibly containing 150,000 tons of ore, according to Veta Grande. The Nivloc mine produced nearly $4 million in silver between 1937 and 1943. The Oyer district, on the western edge of the WSA, has produced $13,000 mainly in silver. Borates were mined in the late 1800s in the marshes of Fish Lake Valley just north of the WSA.

The are many prospects surrounding the WSA and some within the WSA boundary. Those within the WSA boundary include the prospects along the western edge associated with the Dyer district, and one prospect in the southwest corner of the WSA.

Two areas within the WSA have metallic mineral potential. One is an argillized, intensely bleached and iron stained area about two miles wide and five to six miles long with numerous northeast striking erosion resistant ribs. Some of these ribs have geochemically anomalous values which are considered to be indicators of precious metal mineralization. The ribs have been interpreted as the upper parts of epithermal vein systems above potential ore bearing zones. The other area, roughly in the center of the WSA, has an uncharacteristic pink color on aerial photos and has been mapped by Stewart and others (1974) as the Cambrian Harkless (?) formation. The pink coloration and uncertainty of formation identification indicates

alteration, which suggests mineral potential. The Wyman formation, host for mineralization in the adjacent Red Mountain district, crops out in several areas in Esmeralda County. Although the Wyman formation is not exposed in the WSA, it could exist beneath the Tertiary volcanic cover.

There are no known patented claims in the WSA, but several unpatented claims exist. Most of these cover the altered zone northwest of the Red Mountain district. Other claims cover the prospects mentioned earlier.

There are no known uranium or thorium deposits within the WSA. Some radioactive occurrences exist north and east of the WSA.

There are no known oil or gas deposits within the WSA; however, there are two sections under lease for oil and gas. One is in Fish Lake Valley and the other is at the Nevada Oil and Minerals well site. There are no known geothermal deposits within the WSA; however, thermal water has been encountered in Fish Lake Valley, east of the WSA.

Before any final decision is reached regarding the use of this land, the resistant ribs in the northeast part of the WSA should be examined closely and sampled, the possibly altered exposures in the central portion of the WSA should be examined and perhaps sampled and the prospects on the west edge of the WSA should be examined to see if the mineralization and/or alteration extends further into the WSA.

Again, we appreciate the opportunity to respond to this matter. As we receive more information on these areas, we will keep the appropriate agencies informed.

Sincerely,

Doug Driesner

Doug Driesner
Resource Engineer

DD:wf

Comment Letter 22

February 7, 1985

Kemp Conn, District Manager
Las Vegas District
Bureau of Land Managamant
P.O. Box 26569
Las Vegas, Navada 89126

Dear Kemp:

Our review of tha Draft Esmeralda-Southern Nye Planning Area Resource Management Plan and Environmental Impact Statement indicates that tha preferred alternative appoars to be an acceptable alternative for the Bureau's land management programs. The preferred alternativa seams to be beneficial for most interests and should satisfy most of the concerns that hava been raised.

This support for tha prefarred alternative, however, doca not extend to wilderness considerations. Our position on wilderness will be developed with other state agencies and included in the Governor's recommendation. The position may, or may not, be consistent with the wilderness proposal contained in the preferred alternative. You should be aware that designation of wilderness areas in Esmeralda County is strongly opposed by local government as expressed in a resolution by tho County Commissioners and through various hearings and federal land management workshops.

The preferred alternative also appears to be the best alternativa presented for wildlife and livestock usa. We would prefer to see a raduction in wild horse and burro populations whera impacts are significant prior to monitoring confirmation; however, we feel the proposal for later adjustments, where needed, to be satisfactory.

Land disposal potentials contained in the preferred alternativa, whila not as large as those proposed in other alternatives and perhaps not as extensive as those proposed by local govarnments, appear to ba a good beginning toward proper adjustment of tha land tanure problem. Land dispossis, where resource conflicts hava been eliminated or ara not significant, are appropriata and should be implamented with close coordination with state and local governments.

Sincarely,

Mika Del Grosso
Land Use Planner

JMD:jsd

cc: State Clearinghouse

Comment Letter 22

RICHARD H. BRYAN
Governor

STATE OF NEVADA

ROLAND O. WESTERGARD
State Historic Preservation Officer

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF HISTORIC PRESERVATION AND ARCHEOLOGY
201 S. Fall Street
Capitol Complex
Carson City, Nevada 89710
(702) 885-5138

February 12, 1985

MEMORANDUM

TO: John Walker, Office of Community Services

FROM: Alice M. Becker, Staff Archeologist

SUBJECT: ESMERALDA - SOUTHERN NYE PLANNING AREA DRAFT RMP AND EIS.
SAI NV #85300025

The Division has reviewed the Esmeralda-Southern Nye Planning Area draft RMP and EIS prepared by the BLM. Although significant historic properties are protected by Federal preservation law (the National Historic Preservation Act of 1966 and Executive Order 11593), our office would have preferred that specific cultural resource issues be addressed. The planning area has not been extensively examined; however, we do know of the existence of several important cultural resources. Ash Meadows was the location of intense prehistoric activity and is now the focus of efforts to preserve threatened and endangered plant and animal species. Both issues need to be considered in the management of this area. Historic mining towns such as Gold Point and Rhyolite have mixed ownership and real potential for management problems in the future. These situations should be addressed in the plan rather than waiting for crises to arise.

22-8

If you have any questions regarding these comments, please call us. We would be happy to discuss the issues with the BLM.

AMB/de

Comment Letter 22

ROLAND WESTERGARD, *Director*
Department of Conservation
and Natural Resources

LOWELL V. "LODY" SMITH
State Forester Firewarden

RICHARD H. BRYAN
Governor

ROBERT E. POLING, II
Southern Area Forester

Address Reply to
4747 W. Vegas Drive
State Mail Room Complex
Las Vegas, Nevada 89158

RECEIVED ON
FEB 05 1985
OFFICE OF
COMMUNITY SERVICES

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF FORESTRY

MEMORANDUM

February 4, 1985

TO: Bob Poling,
Southern Area Forester

FROM: John Jones, Resource Mgt. Officer,
Southern Area

SUBJECT: Esmeralda - Southern Nye Draft RMP/EIS

After reading the Wilderness Technical Report for the Esmeralda-Southern Nye Draft Range Management Plan and Environmental Impact Statement published by BLM, I have these comments on its contents. The report examines several proposed wilderness areas in detail with respect to their suitability for designation as wilderness. The only area included in the Preferred Alternative of the RMP is the Silver Peak Range. I agree with this selection and the proposed boundaries in the Preferred Alternative, although the Technical Report suggests expansion of the boundaries rather than reduction. I feel that the Preferred Alternatives designation is more sensible because it excludes the portions of high metallic mineral favorability and existing mining claims while retaining the areas of most desirable wilderness value.

I have no other comments on either document aside from those made to you earlier. Attached are the face sheets that came with each copy noting the response deadline as February 6, 1985.

JJ:pe

Comment Letter 23

Mr. Kemp Conn, District Manager
Bureau of Land Management
POB 26569
Las Vegas, NV 89126
Atten: Esmeralda-S. Nye RMP

February 19, 1985

Dear Mr. Conn,

I would like to express my views on the Esmeralda-Southern Nye Planning Area Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS). The document, prepared by the Bureau of Land Management under your direction, is to be commended for the effort put into the RMP-EIS and its excellent presentation. My letter will address the three issues put forth in the draft.

ISSUE #1 - WILDERNESS - ALTERNATIVE B (page 24)
This alternative is a compromise. All wilderness or a small allotment as is found in the Preferred Alternative are in the extreme. By selecting Alternative B, wilderness is given a chance of being a viable resource. I believe compromise is important when dealing with mineral rights, land tenure, utility corridors, rangeland, and wilderness.

ISSUE #2 - LAND TENURE AND UTILITY CORRIDOR - PREFERRED ALTERNATIVE (page 19)
Utility corridors need long-range planning. To facilitate this need, the Preferred Alternative is more acceptable than the others presented. The future use of "designated corridors" will enhance utility companies planning abilities. However, an increase in "planning corridors" could lead to unsightly and unnecessary transmission lines. "Planning corridors" should be looked at with consideration given to their actual need. Land tenure, as described in the Preferred Alternative appears to be reasonalbe and not too excessive.

ISSUE #3 - RANGELAND - PREFERRED ALTERNATIVE (page 19)
Rangeland is an important aspect of any resource management plan. Wise use of rangeland will either enhance an area, thus assuring continued productivity, or degrade an area to where it is of no use to any animal wild or domestic. Livestock, wild horses and burros, and wildlife would benefit under the Preferred Alternative. The rangeland in these areas are extremely fragile and in reasonably good condition. An increase in grazing may endanger species that are marginal in the areas under consideration. However, the trade-off of a slight increase in livestock for an increase in wildlife seems, to me, to be acceptable.

Thank you for the opportunity to express my views and for taking the time to read my letter.

Respectfully,

Becky Parr

Becky Parr
5303 Stampa Ave.
Las Vegas, NV 89102

Comment Letter 24

Mr. Kemp Conn
District Manager
BLM
Las Vegas, NV 89126

14.02.85.

Dear Mr. Conn,

In reference to the DRMP/EIS for the Esmeralda- Southern Nye Planning Area, I support the Preferred Alternative but with the following comment:

I question the merit and what will be achieved by classifying some of the Silver Peak WSA as a WA. The topography will protect this core area, as is, without looking out other potential resources, should these be discovered in the future. Moreover there is the vast Death Valley National Monument nearby and others, closer to population centers are proposed as wilderness areas. Even your own report seems to concur by stating on p. 97 "It would not significantly expand the opportunities for wilderness experience available to residents of the metropolitan areas within a day's drive".
Locking up more acreage for a few for their exclusive use is not warranted. The report does not touch on the question as to the projected increasein numbers of person/days should Silver Peak declared a WA. So many wilderness areas have been and will be designated that a mere desigantion no longer will allure more hikers in significant numbers. The USFS figures sometimes quoted are therefore outdated. The potential increase in recreational resources use is a function of information made available, covering a specific area. Obviously such information can be promoted without wilderness designation. Support therefore a non-wilderness designation for Silver Peak WSA.

Sincerely,

Harry Melts

Harry Melts
Box 54
Porthill, ID 83853

Comment Letter 25

JOHN R. SWANSON
P. O. Box 927
Berkeley, CA 94701

2/Feb/84 11:12 PST

Bureau of Land Management
District Manager ~ Las Vegas District
P.O. Box 26569
Las Vegas, Nevada 89126.

Dear Sir,

Please accept my comments, recommendations, concerning =
Draft Resource Management Environmental Statement/Impact Statement for the =
Esmeralda - Southern Nye Planning Area

I am well acquainted with this area and consider the Esmeralda - Southern Nye area as containing outstanding wilderness, scenic, wildlife, fish, historic and cultural resources, (as well as timber) significance
and an area that provides a vital and valuable economic base, a sporting refuge for Man and for all life, within its environmental capacity.
An area, that is fully limited by Man and fully benefits all life on this Esmeralda Earth.
I thoroughly recommend that this Esmeralda - Southern Nye area be identified and set aside as an area of the most wilderness Preserve and that all lands managed by the Bureau of Land Management be identified and set aside as Preserves with the purpose of the Bureau of Land Management to manage and protect these Preserves for wilderness, scenic, wildlife, Birds, Biome, Biological Resources and cultural Resources for all of the Public benefit.
With such Preserves to protect recreations, preserves watersheds, scenic and enhance all wildlife - birds and their habitats, protect and promote all Biological Resources and their diversity, restore and recover all land - Bureau areas to their natural environmental conditions - and to preserve, protect, strengthen and expand wilderness
With wilderness the foundation of all Land and Water Resources.
As the purpose of all Land and Water Resources planning - management is to preserve, protect, strengthen and expand wilderness
I strongly urge that the following areas - Areas located in this Esmeralda - Southern Nye Planning area be fully classified and permanently protected as Wilderness, or such other unit hereinafter designated under wilderness classification and to be - included - in our National Wilderness Preservation System - at this time
- Silver Peak Range north 48,750
- Queen spring 5120.
- Queen Mountain 107,040.
- Grapevine Mountains 94,800.
- Parker Mine 7,260.
- Dean 2,800.
- Armagosa 15,950
- North Big Dune 13,270.
- Resting Spring Range 7240.
- Monte Cristo, Lida 104,470.
- Plus, an additional 112,000 Acres
- So. other lands some 1530,000 Acres of Bidden area, no management - at present time by the Bureau of Land Management located on this Esmeralda - Southern Nye Planning Area
with a total of wilderness located on this Esmeralda - Southern Nye Planning area ~ only
So classify the following areas as National Park System units: with Acres
- Crystal Spring 22,000, - Monte Cristo 18,000, - Dune Mountains 26,000, - Big Dune 10,000,
- Ash Meadows - Pupfish Marsh 64,000 and - Oasis Amargosa Canal 24,000

With Each area located on a National Monument
Plus, Add Each of the following areas to the Death Valley National Monument : with Acres
- Queen Mountain 107,040, - Grapevine Mountains 94,800, - Parker Mine 7260, - Dean 2,800,
- Armagosa 15,950 and - Nothing Else 13,270 - also nothing area of about 102,000 (excluding Paiute Spring - South Death Valley even both).

So select as the permanent planning - management alternative for the Planning area =
alternative Preservation of wilderness with its Biological Resources
With a permanent Ban on all surface and sub surface development on all areas proposed Wilderness and wilderness Study areas, plus, Potential Wilderness
To request all Bar bottlenecks on all Public lands. With No Cut no road - in any Public Lands.

Sincerely,
D. R. Swanson

89

Comment Letter 26

S M FRANKIEL
11855 GOSHEN AVE. #9
LOS ANGELES, CA 90049

FEB 14, 1984

Mr. Kemp Conn, Dist. Mgr.
Bureau of Land Mgmt.
PO Box 26566?
Las Vegas, Nev. 89126

Dear Mr. Kemp Conn;

I am a citizen of California, who has personally enjoyed desert expanse in a undisturbed state. I would appreciate your support in wilderness recommendations for:

Grapevine Mtns. WSA 66.8 K acres
Queer Mtn. WSA 81,550 acr
Silver Peak Range WSA 35 000 ac

Comment Letter 27

DESERT BIGHORN COUNCIL

Established to promote the advancement of knowledge concerning the Desert Bighorn Sheep and the long-range welfare of these animals.

P.O. Box 1383
Loomis, CA 95650

10 February 1985

Mr. Kemp Conn, District Manager
Bureau of Land Management
P.O. Box 26569
Las Vegas, NV 89126

Dear Mr. Conn:

The Desert Bighorn Council appreciates the opportunity to review and comment on the Esmeralda-Southern Nye Draft RMP and EIS. Our comments will center on desert bighorn sheep.

27-1 There is much discussion of seral stages in this document, yet little definition of these stages as they relate to forage (especially grasses and forbs) quality for the several species of large herbivores (horses, cattle, domestic sheep, bighorns, deer, and elk). Is "late seral" good, or fair, or poor, for the various large herbivores? This should be addressed in the final EIS, as it would make interpretation of the entire vegetation resource discussion much more understandable, and therefore meaningful.

27-2 The preferred alternative, as it is written and tabularized, appears to be all things to all users of the vegetative resource. It appears that each specialist (wildlife, wild horses, and livestock) made his own projections and recommendations without benefit of correlation with either of the other specialists. Based on this, we suggest that all comments about bighorn introductions and reintroductions into potential and historic areas be deleted, as there is no chance, based on what is in this document (including comments on each allotment in Appendix C), and based on our collective experience, that these areas will ever be able to support bighorn sheep unless all of the wild horses and burros, and some of the existing livestock, are removed, and the bighorns are allocated forage and have waters developed strictly for them.

These same comments apply to existing bighorn use areas: Silver Peak, Lone Mountain, Monte Cristo, and Stonewall. Bighorn sheep are classified as Sensitive Species in Nevada

Comment Letter 27

and they are limited in distribution to certain habitats. Wild horses, on the other hand, have a much wider habitat tolerance, and their distribution in the planning areas is much greater, based on your own maps. Also, conflicts between bighorns and horses have been documented in this area for over a decade. This should be addressed in the final EIS.

27-3

27-4 We support the proposed change in class of livestock from domestic sheep to cattle in the Emigrant Peak allotment, but would like to know the BLM's reasoning behind implementing grazing in this allotment since it has not had any livestock grazing for several years, and since grazing use now would conflict with existing bighorn populations in the Silver Peak area.

27-5 The Bighorn Sheep Wildlife Habitat map shows the Specter Range, east of Lathrop Wells, as potential habitat, yet it is not listed in Table 3-6, nor is it clear what grazing allotment it is in, based on the Allotment map. Please clarify this.

27-6 The Council would also like to see a short discussion in the final EIS as to why there are no longer bighorns in the historic areas shown adjacent to existing bighorn populations in the Monte Cristo, Lone Mountain, and Silver Peak areas.

If you have any questions on our comments, or need additional input, please contact me. Thank you.

Sincerely,

Richard A. Weaver, Chairman
DBC Technical Staff

(1)

5141 Indian River #279
Las Vegas, NV. 89103
Feb 15, 1985

Kemp Conn, Distr. Mgr
Bureau of Land Mgmt
Las Vegas, NV.

Dear Mr. Conn:

This is in reference to the BLM's recommendation against Wilderness status for the Grapevine Mountains, Quartz Mountain, and 1/2 of the Silver Peak Mountains.

I have been visiting the Death Valley area, both as a California resident and as a recent resident of Nevada, for 35 years and know the area well.

For many years, I have watched with dismay the gradual destruction and deterioration of many of our beautiful and fragile desert areas. I feel strongly that we must do what we can to preserve areas such as these that surely meet all of the requirements for Wilderness designation.

Comment Letter 28

(2)

It would be a shame if California land contiguous to Death Valley were protected by Wilderness status, but the Nevada land were left unprotected. (The Grapevines + Quartz Mountain).

I feel that your argument against recommending against Wilderness status for Quartz Mountain and 1/2 of the Silver Peak Range (difficulty of enforcement) is specious. Certainly these areas can be posted and violators, if apprehended, can be prosecuted.

Silver Peak, although a bit north of Death Valley, is a spectacular piece of desert and is a range for many mountain sheep and wild horses. That alone should be reason enough for Wilderness protection.

Thank you for considering the thoughts contained in this letter.

Yours truly,

Daniel L. Cummings

Daniel L. Cummings
5141 Indian River #279
Las Vegas NV. 89103

Comment Letter 29

FEB 16, 1985

Mr. Kemp Conn, District Manager
Bureau of Land Management
PO Box 265669
Las Vegas NV 89126

Dear Mr Conn:

We support Wilderness recommendations for the Silver Peak Range WSA (35,000 acres), the Grapevine Mountains WSA (66,800 acres) and the Queer Mountain WSA (81,550 acres).

Wilderness is the best and most logical use for these areas as none have significant resource conflicts and all clearly qualify for Wilderness designation.

Silver Creek Range is important to large herds of Bighorn Sheep and wild horses as well as having outstanding wilderness qualities.

Both Grapevine and Queer Mountain WSA's are logical extensions of the Death Valley National Monument area and should be protected.

Sincerely
Betty Mason
Rex Mason
Scott Mason
1385 Harty St.
Bakersfield Ca. 93304

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Comment Letter 30

The Nature Conservancy

Western Regional Office
785 Market Street
San Francisco, California 94103

February 15, 1985

Mr. Kemp Conn
District Manager
Bureau of Land Management
P.O. Box 26569
Las Vegas, Nevada 89126

RE: Nature Conservancy Response to Esmeralda-Southern Nye HMP

Dear Kemp:

The Nature Conservancy is a national, non-profit organization dedicated to the protection of natural diversity. Over the past 30 years, we have helped set aside over 2,250,000 acres of land which provides habitat for some of our nation's most endangered species of plants and animals, as well as many unique habitats. The Nature Conservancy has been involved in the protection of several areas of Nevada, most particularly aquatic systems such as Ash Meadows, which is located in the Esmeralda-Southern Nye Planning Area of the Bureau of Land Management. I believe we share a continuing concern over proper future management of this aquatic system of national significance. The Nature Conservancy has also identified other areas on both private and public lands within this Planning Area that our scientists feel are of high ecological value, and we would like to continue our cooperation with BLM to work for the best management of these areas as well. I have a few specific comments that I would like to submit for your consideration:

30-1 1. The Nature Conservancy expresses its support for Alternative C, excepting therein provisions calling for 0 grazing and 189,675 acres of wilderness. Of particular concern to us is the protection of rare plant species and aquatic habitat at Ash Meadows from any possible threats. We view grazing by either livestock or by wild horses and burros as an unacceptable threat to the Ash Meadows area, and urge the elimination of grazing combined with an active monitoring program to determine status of rare plant populations in the Ash Meadows region.

National Office, 1800 North Kent Street, Arlington, Virginia 22209

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Comment Letter 30

30-2 2. Areas of Critical Environmental Concern (p. 6). The designation of the Ash Meadows area, including adjoining BLM land including but not limited to Carson Slough, as an ACEC would serve to extend and solidify special management procedures necessary to protect the rare biota found in this region. The Big Dune area is also an area of high biological significance, and ACEC status for this region would represent a positive move in its future management. The Nature Conservancy supports designation of ACEC's in such areas of biological significance.

30-3 3. The Carson Slough grazing allotment should be reduced (p. 20) in all areas where it presents a threat to aquatic habitat or to populations of plants of concern, including those species that are candidates for Federal listing as endangered species. Grazing throughout the rest of the planning area, with the exception of Ash Meadows, should be allowed so long as provisions are made for the protection of riparian systems and endangered species.

30-4 4. Habitat for the Amargosa toad (Bufo nelsoni), a Federal candidate species, is identified as subject to disposal in Land Disposal Unit K (Planning Corridor E). Some of these lands also support streams with populations of a speckled dace (Rhinichthys osculus ssp.) that is a potentially endangered species. As noted on page 92, disposal of public lands which provide habitat for these species would be a significant adverse impact to these animals. The Nature Conservancy supports not only continued public ownership of these lands, but management of them to ensure future protection of these rare species. If land disposal is considered, future use of that land should be restricted to provide protection to those species.

30-5 5. The sensitive plant species of Ash Meadows (p. 49, 91-92) are known from relatively small areas within Ash Meadows. Not only should those known areas be protected from threats from grazing, but other potential areas should be searched for these species. The elimination of grazing from the Ash Meadows area is an essential step to facilitating recovery of the area's flora.

The Nature Conservancy is currently trying to raise the money to develop a Nevada Natural Heritage Program which will be responsible for maintaining an ongoing inventory of rare plants, animals, and communities of Nevada. As data are analyzed by this program, our understanding of the location and significance of rare species and habitats in the Esmeralda-Southern Nye Planning Area will improve. We hope to cooperate with the Bureau of Land Management in the gathering and analysis of these data, which will be available to help both organizations develop and update their agendas in Nevada.

Comment Letter 30

I appreciate the opportunity to provide input to the planning process in this diverse portion of the Great Basin. Please keep me informed as to further developments of mutual interest to BLM and The Nature Conservancy.

Yours truly,

Dave P. Livermore
Great Basin Field Representative

DPL:GC

Comment Letter 31

P.O. Box 2654
Gardena, Ca 90247
Feb 16, 1985

Mr Kemp Conn, District Manager
Bureau of Land Management
P.O. Box 265669
Las Vegas, NV 89126

Dear Mr. Kemp:

I urge you to support wilderness recommendations for:

Grapevine Mountains WSA (66,800 acres)
Queer Mountain WSA (81,550 acres)
Silver Peak Range WSA (35,100 acres)

None of these areas have significant resource conflicts. Wilderness is the best designation for these areas

Silver Peak is particularly important for large herds of bighorn sheep and wild horses.

Sincerely
Iva M Perkins
(Iva M. Perkins)

Comment Letter 32

Feb. 15, 1985

Mr. Kemp Conn -

I'm writing to let you know that I support the wilderness recommendations for the following areas that clearly qualify as wilderness.

1. Grapevine Mountains WSA (66,800 acres)
2. Queer Mountain WSA (81,550 acres)
3. Silver Peak Range WSA (35,000 acres)

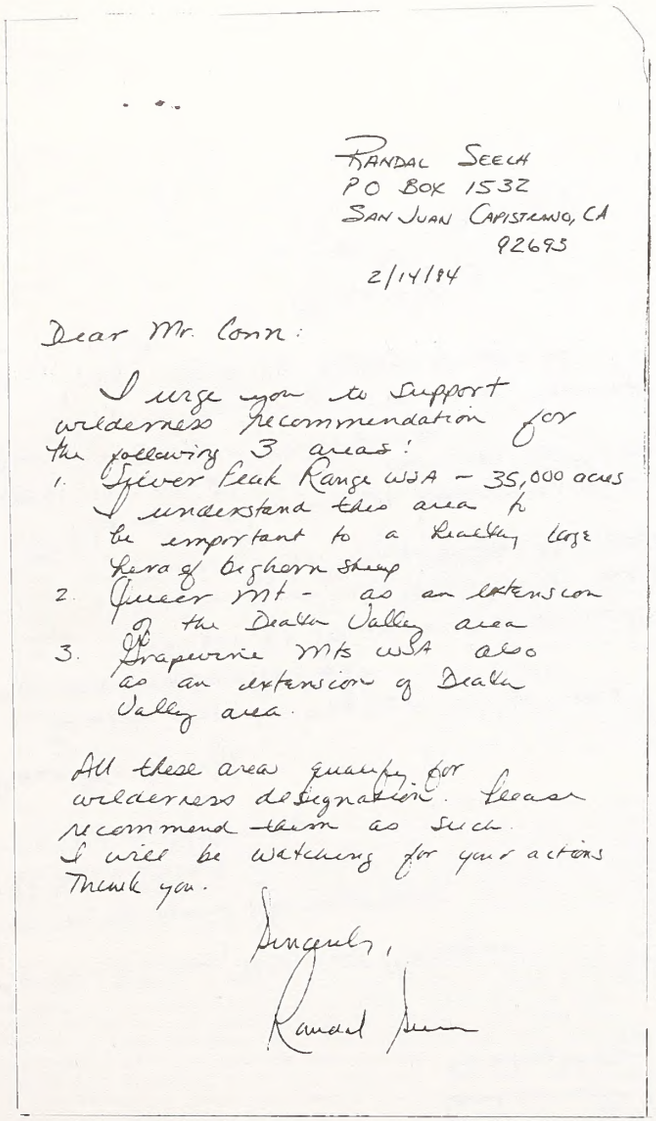
The first two areas are extensions of the Death Valley wilderness and must be protected.
The Silver Peak Range has outstanding wilderness qualities such as wildlife and must be protected.

None of these areas have resource conflicts therefore wilderness is the best use of this land.

Please support these areas.

Thank you,
Maiska George

Comment Letter 33



Randal Seech
PO Box 1532
San Juan Capistrano, CA
92693

2/14/84

Dear Mr. Conn:

I urge you to support wilderness recommendation for the following 3 areas:

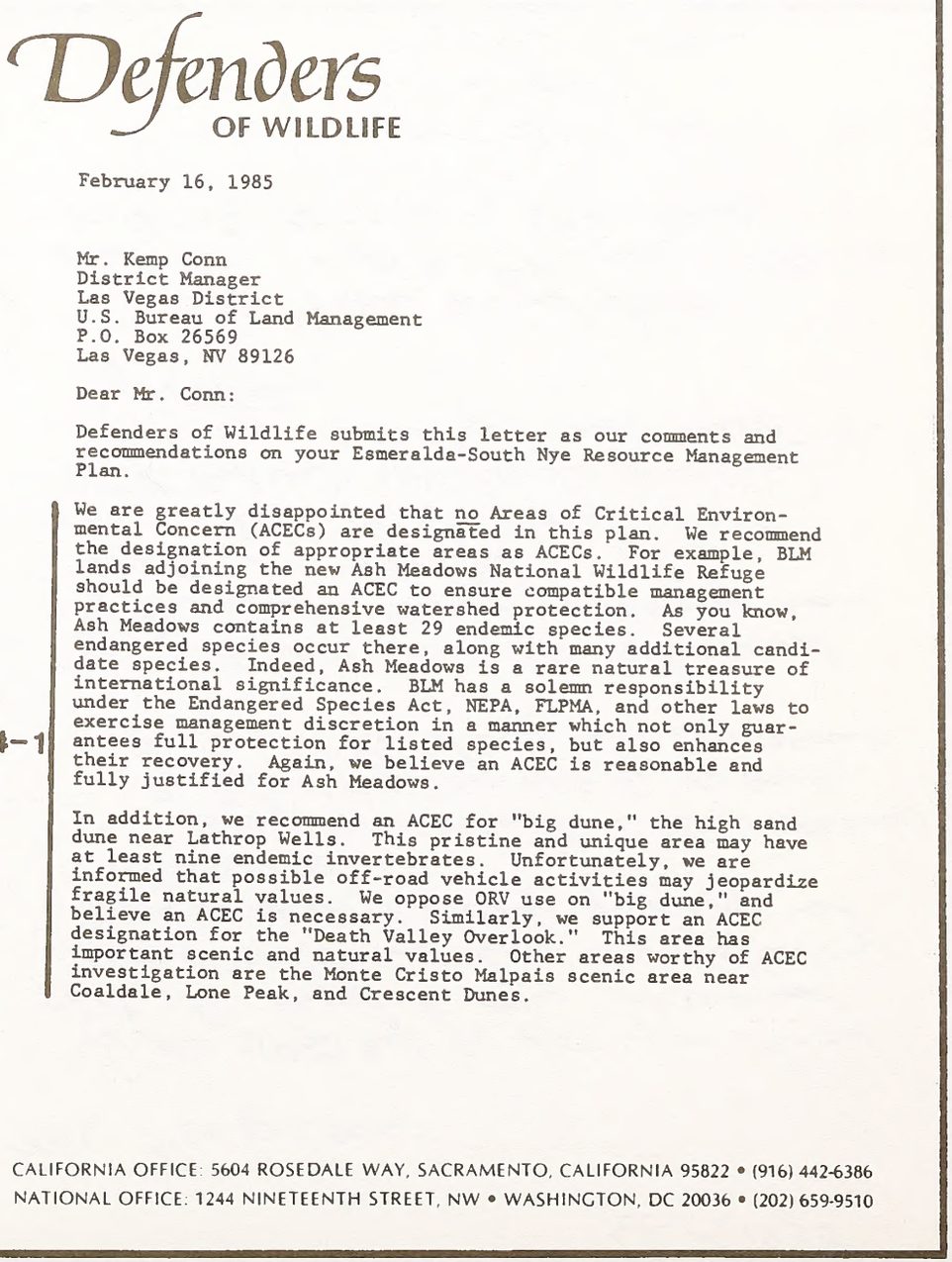
1. Tijuver Peak Range WSA – 35,000 acres
   I understand this area is to be important to a healthy large herd of bighorn sheep
2. Queer Mt - as an extension of the Death Valley area
3. Grapevine Mts WSA also as an extension of Death Valley area.

All these areas qualify for wilderness designation. Please recommend them as such.
I will be watching for your actions
Thank you.

Sincerely,

Randal Seech

Comment Letter 34



Defenders
OF WILDLIFE

February 16, 1985

Mr. Kemp Conn
District Manager
Las Vegas District
U.S. Bureau of Land Management
P.O. Box 26569
Las Vegas, NV 89126

Dear Mr. Conn:

Defenders of Wildlife submits this letter as our comments and recommendations on your Esmeralda-South Nye Resource Management Plan.

34-1 We are greatly disappointed that no Areas of Critical Environmental Concern (ACECs) are designated in this plan. We recommend the designation of appropriate areas as ACECs. For example, BLM lands adjoining the new Ash Meadows National Wildlife Refuge should be designated an ACEC to ensure compatible management practices and comprehensive watershed protection. As you know, Ash Meadows contains at least 29 endemic species. Several endangered species occur there, along with many additional candidate species. Indeed, Ash Meadows is a rare natural treasure of international significance. BLM has a solemn responsibility under the Endangered Species Act, NEPA, FLPMA, and other laws to exercise management discretion in a manner which not only guarantees full protection for listed species, but also enhances their recovery. Again, we believe an ACEC is reasonable and fully justified for Ash Meadows.

In addition, we recommend an ACEC for "big dune," the high sand dune near Lathrop Wells. This pristine and unique area may have at least nine endemic invertebrates. Unfortunately, we are informed that possible off-road vehicle activities may jeopardize fragile natural values. We oppose ORV use on "big dune," and believe an ACEC is necessary. Similarly, we support an ACEC designation for the "Death Valley Overlook." This area has important scenic and natural values. Other areas worthy of ACEC investigation are the Monte Cristo Malpais scenic area near Coaldale, Lone Peak, and Crescent Dunes.

CALIFORNIA OFFICE: 5604 ROSEDALE WAY, SACRAMENTO, CALIFORNIA 95822 • (916) 442-6386
NATIONAL OFFICE: 1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

Comment Letter 34

Defenders of Wildlife is disappointed that BLM recommends only one of the five Wilderness Study Areas (WSAs) for wilderness designation. We believe that substantial additional WSA acreage should be recommended for wilderness protection. For example, in the Silver Peak Range (060-0338), we support 33,900 acres for wilderness under a slight improvement of "Alternative B." This WSA has numerous springs and critically important riparian habitat. It also possesses significant wildlife values, including bighorn sheep and rare spotted bat.

For the Grapevine Mountains (060-0355), we recommend at least 55,000 acres for wilderness. Protection of this area would benefit bighorn sheep habitat and rare flora, as well as being a scenic adjunct for Death Valley National Monument.

For Queer Mountain (060-0354), we support a modification of Alternative "C" of 60,000 acres to protect primitive bajadas and Joshua tree forests.

We hope that BLM will recommend the designation of the above ACECs and increase the recommended acreage for wilderness protection as outlined in this letter.

Thank you very much for considering our views.

Sincerely,

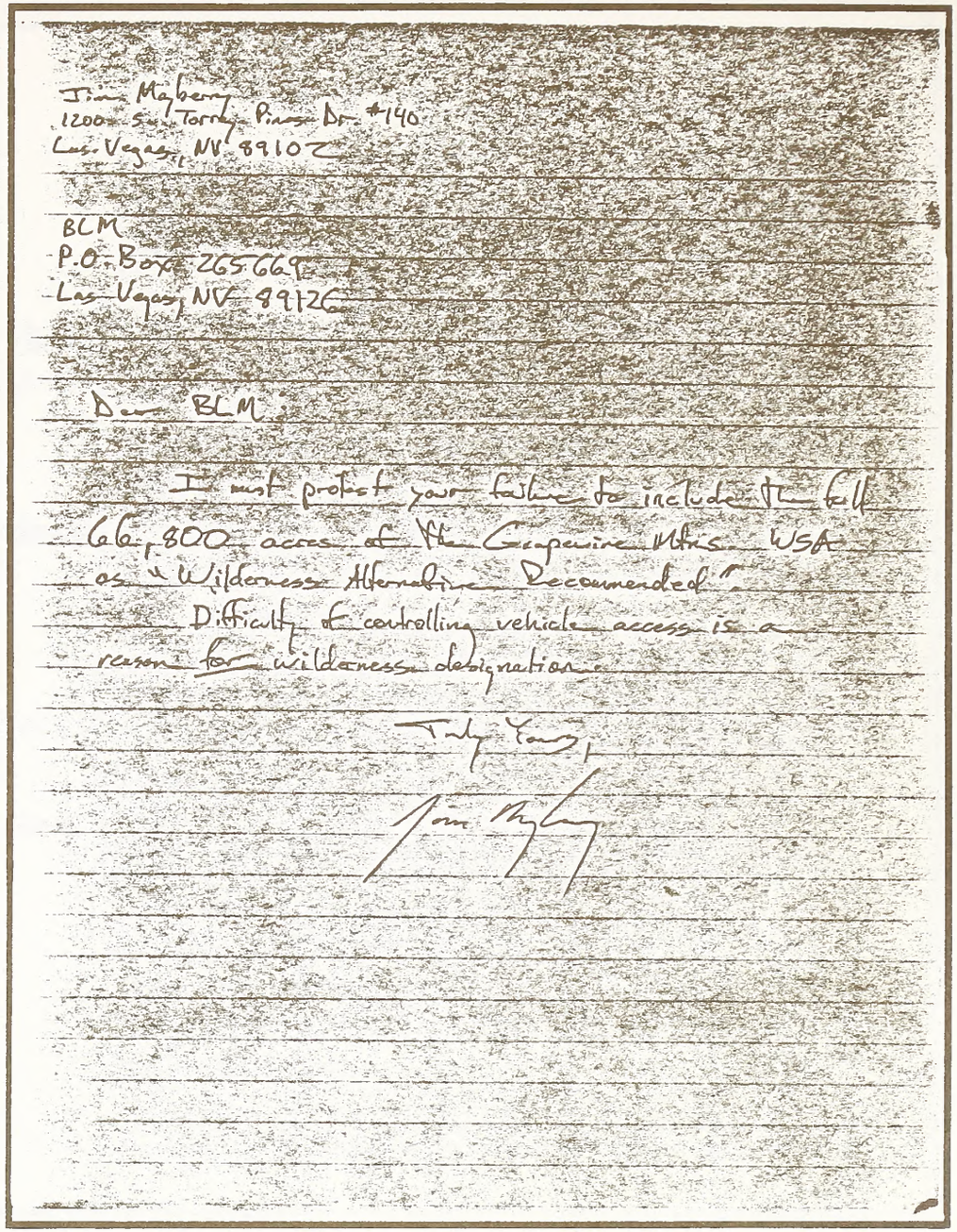
Richard Spotts
RS

Richard Spotts
California Representative
Defenders of Wildlife

RS/js

cc: Interested parties.

Comment Letter 35



Jim Mayberry
1200 S. Torrey Pines Dr. #140
Las Vegas, NV 89102

BLM
P.O. Box 26569
Las Vegas, NV 89126

Dear BLM:

I must protest your failure to include the full 66,800 acres of the Grapevine Mtns WSA as a "Wilderness Alternative Recommended". Difficulty of controlling vehicle access is a poor reason for wilderness designation.

Truly Yours,

Jim Mayberry

SIERRA CLUB

Toiyabe Chapter – Nevada and Eastern California

February 14, 1985

Kemp Conn, Manager
BLM/Las Vegas District
PO Box 26569
Las Vegas, NV 89126

Dear Manager Conn,

On behalf of the Public Lands Committee of the Toiyabe Chapter of the Sierra Club, I am submitting comments on the Draft Resource Management Plan and Environmental Impact Statement for the Esmeralda-Southern Nye Planning Area.

36-1 We submit these comments with some trepidation as our previous comments appear not to have reached your office. Contrary to a statement in the DEIS on p. 76 which indicated that no comments were received in the scoping process from "stakeholder groups which are advocates of wilderness," the Sierra Club has sent four letters to you concerning the Esmeralda-So. Nye RMP. Other conservation groups have also commented to our understanding. The first letter the Sierra Club sent on May 12, 1984, requested a scoping workshop in the Reno-Carson area so that northern Nevadans might more directly participate in the planning process. The 2nd & 3rd letters were sent in late May with detailed comments from the Las Vegas Group of the Sierra Club on both issues and alternatives and preliminary comments from myself as I had not yet received a copy of the scoping document. I sent the last letter in August, 1984, after I reviewed the scoping document, with very detailed recommendations on issues and alternatives.

We are very disappointed that, if you received them, none of our recommendations appear to have been accepted and implemented in the DEIS, nor is there any explanation for rejecting our comments. To be sure you will have received our input, we would like to incorporate by reference all the comments we have sent to you on the Esmeralda-So. Nye RMP to date. (Copies of this correspondence are enclosed.) If you did not receive them previously, we would like to see our input reflected in the Final RMP/EIS, or an explanation for your rejection of them.

In any event, we would like to emphasize that the Sierra Club is interested in and concerned with this area of the public lands. We have participated in the planning process to date and will continue to participate whenever we have the opportunity to further our goals of good resource planning and management.

Overall, the quality of this document is high, despite the lack of any real information on the planning area's resources or management problems, or a positive plan for solving those

LAS VEGAS GROUP
P.O. Box 19777
Las Vegas, Nevada 89119

GREAT BASIN GROUP
P.O. Box 8096
University Station
Reno, Nevada 89507

To explore, enjoy, and protect the wild places of the earth . . .

Comment Letter 36

problems. In its errors of omission, the DEIS/RMP reflects not only current BLM policies which prohibit effective planning for and management of our public lands for multiple use and sustained yield, but also that this little planning area has been greatly neglected by the Bureau.

Issue statements in Chapter 1 are quite poor. All of the various multiple uses of the public lands have been reduced to three, mostly commodity oriented, uses - utility corridors and land sales, range management (or livestock grazing and two uses which interfere with the livestock industry - wildlife and wild horses and burros) and wilderness. We object to this cavalier treatment of the non-commodity values and believe this draft plan is inadequate because of these omissions.

36-2 Despite a statement on p. 6, ACECs were identified as an issue during scoping. We support among other candidates the NORA nominations of several environmentally special areas which we feel should be evaluated by the Bureau for ACEC status: the BLM lands in Ash Meadows, Big Dune, Death Valley Overlook (Big Moly), the Monte Cristo malpais areas, Lone Peak, and Crescent Dunes.

On p. 2, Step 4, Analysis of the Management Situation, is defined as a description of current BLM managment guidance, a discussion of existing problems and opportunities for solving them, and a consolidation of existing data that is needed to analyze and resolve the identified issues. We believe the DEIS/RMP would greatly benefit if more of this information is included in the RMP. In any event, we request a copy of the AMS so that we can review this information.

36-3 We found the discussion of the "management guidelines" in Chapter 2 to be inadequate as a justification for the omission of most of the resource values from active consideration in the DRMP/EIS. Guidelines change daily and are not an adequate basis for planning for T&E species, recreation, and the other resource values rejected from active planning consideration in this document.

36-4 We found the description on p. 14 of "Treatment 1," yearlong livestock grazing, to be ironic, since most resource problems are due to this type of "wild cow operation." It should have been entitled "Problem #1"! Also, we hope the statement on p. 17 that "all public land is open to geothermal, oil and gas leasing with no special stipulations except in bighorn sheep areas" is incorrect as it appears to contradict the Bureau's "management guidelines" much less national laws on T&E species as well as other critical resource management requirements.

In general, we believe that the range of alternatives is inadequate for half of the issues BLM did choose to address - wilderness, wildlife, and utility corridors (please see our previous comments). We do appreciate the analysis of a no grazing alternative.

We requested in our scoping comments for the DEIS/RMP disclosure

36-5 of what existing rangeland monitoring studies are being carried on in the planning area. On p. 21 in the discussion of the preferred alternative, we learned that these studies will be "continued," but we request again that the FEIS/RMP disclose the extent of the current monitoring program.

36-6 Although one of the objectives of the preferred alternative is "to maintain or improve selected riparian and stream habitat to good or better condition," no management prescription is listed on p. 20 or p. 21 to reach this worthy objective. The FEIS/RMP should describe such a management prescription. We strongly support the reintroduction of big horn sheep, positive management for wild horses and burros, the introduction of big horn sheep, and the augmentation of elk in the Spring Mountains.

We support the utility corridor portions of the no action alternative, as the DEIS/RMP does not support the need for such extensive corridors which cover most of the surface area of the planning area. Only the most optimistic utility company planner could believe that the demand for power and therefore power lines will increase at such fantastic rates.

36-7 Please explain how the wilderness objective in alternative A "to obtain the greatest degree of consumptive use and production, while recommending only those areas with the highest wilderness values as suitable for wilderness designation" lead to a recommendation of 17,850 acres, the same wilderness recommendation as the preferred alternative with an objective "to recommend wilderness designation for those wilderness study areas where the values of wilderness designation are capable of balancing the other resource values and uses which would be foregone due to wilderness designation?" It would appear to us that these objectives are mutually exclusive and should have resulted in significantly different wilderness recommendations, which would have improved the range of alternatives as we suggested in our scoping comments. In general, this alternative is nearly a word-for-word repeat of the preferred alternative which may explain the non-balanced options in the preferred alternative.

We strongly support the management prescription in alternative B to "implement management treatments and/or facilities along 4.8 miles of streams to improve aquatic and riparian habitat conditions." We only regret that the Bureau will not attempt to protect more of the planning area's scarce riparian resources. We strongly support the wilderness recommendation for Silver Peak whose qualifications are well established in the DEIS/RMP and Technical Report. We also support the wilderness recommendations for the Grapevine WSA and the Queer Mountain WSA (contingent on the designation by Congress of Little Sand Spring WSA on the California side as wilderness).

In alternative C, we support the land disposal portion. We do not support the elimination of livestock grazing from the planning area.

Comment Letter 36

Although the procedures are extremely difficult to understand, inventory information in Chapter 3 reveals that 77% of planning area is in "high seral" or good condition. The document does not indicate the reason for this unusually good range condition. Either BLM is doing something right in its management actions which should not be changed or the good conditions are a result of an accident - light livestock use due to the generally low productivity of range vegetation and/or lack of water to support more livestock numbers. In either case, overgrazing in terms of livestock overstocking does not appear to be the major resource problem in this planning area. Overuse by livestock and wild horses and burros of the scarce riparian resources is the real problem. We do not accept, however, BLM range management prescriptions which will result in predicted further degradation of riparian areas. Some other prescription must be developed without further adverse impacts to invaluable riparian areas. And current year-long grazing in 70% of the allotments is not an acceptable solution!

36-8

36-9

36-10 In Chapter 4, we were dismayed to learn that the extensive utility corridors would adversely impact deer habitat. We also learned that the massive land disposals contain areas of crucial habitat for T&E species and would adversely impact wild horse and burro habitat. We are very concerned to learn that land disposals may conflict with the remains of irrigation ditches found in Little Fish Lake Valley whose origin has not yet been determined. We strongly object to any land disposals which adversely affect wildlife or cultural resources. We urge BLM to avoid these adverse impacts and select the lowest alternative of land disposal and case-by-case utility corridor designation.

36-11 One of the assumptions for analysis on p. 85 really strains our credulity. We are informed that "baseline data for vegetative condition and trend is the best available." Therefore we fail to understand why "while this data is not adequate by itself for making forage allocation decisions, it is adequate for planning and analysis purposes." Either the data is adequate or it is not adequate. How much data does BLM need to actually make a range management decision?

It would be so easy for BLM to revise this document into an adequate plan for resource management in the Esmeralda-So. Nye Planning Area, since its foundations are so sound. We formally make this request. We realize that our request is not likely to be met given current BLM policy as all alternatives propose "do nothing and monitor," despite their superficial differences. We do commend Las Vegas District BLM staff for doing the best they could given time, staff, and policy constraints.

Sincerely,

Rose Strickland

Rose Strickland, Chair
Public Lands Committee

Comment Letter 37

RECEIVED
Bureau of Land Management
FEB 2 0 1985
LAS VEGAS
DISTRICT OFFICE
Las Vegas Nevada

Mrs. Jo Neugent
1815 Pompeo Ave.
Santa Barbara, CA 93101
Feb. 16, 1985

DM	Int	Date
ADM		
PAO		
DM RM		
DM OPER		
DM ADMIN		
DM SRA		
DM PATIENTE		

Mr. Kemp Conn, District Mgr.
Bureau of Land Management
P.O. Box 265669
Las Vegas, NV 89126

Dear Mr. Conn:

I have read that of the BLM wildlands surrounding the Death Valley Monument, specifically the areas known as Grapevine Mountains, Queer Mountain and the Silver Peak Range, the BLM is considering recommending that only one-half of the Silver Peak Range for wilderness to Congress.

This means designating only 17,500 acres for wilderness protection out of a total of 183,350 acres.

The Sierra Club states none of these areas have significant resource conflicts, so what better use for them than preservation as public wildlands?

Please reconsider your decision and give the entire area BLM's support. Such support, once relinquished, can never be of any use once Congress acts. We Americans all need as much natural beauty as we can hang on to.

Sincerely,

J. Neugent

Comment Letter 38

Mr. Kemp Conn, District Manager
Bureau of Land Management
P.O. Box 265669
Las Vegas, NV 89126

Feb. 17, 1985

Dear Sir;

I would like to take this opportunity to express my views on the possible designation of wilderness areas in your state. I am referring to the Grapevine Mountains, Silver Peake Range and the Queer Mountains. All these areas have outstanding wilderness qualities that would qualify them for this special status. I feel that it is important to save as much wilderness for future generations. Also I would like to see the habitats of wild animals saved in the largest proportions possible as they have no where else to go.

There are no resources of significant value in these areas to conflict with the interests of others. Also the Grapevine and Queer Mountain areas are close to Death Valley and could become an extension of that wilderness area.

Please consider saving all of these areas for future generations, after all there is so little left that has not been touched by man.

Thank you,

Sincerely,

Comment Letter 39

Glenn C. Miller
581 Creighton Way
Reno NV 89503

Feb 19, 1985

Mr. Kemp Conn
Bureau of Land Management
P.O. Box 26560
Las Vegas, NV 89126

Dear Mr. Conn,

This letter is written in support of the Wilderness emphasis alternative of the Esmeralda EIS. Specifically I support recommending the Grapevine Mountains WSA (66,810 acres), Queer Mountain WSA (81,550 acres) and Silver Mountain WSA (35,000 acres). The Silver Peak area has particularly high wildlife values, and needs to be expanded to the full 35,000 acres for recommendation in the final EIS. The bighorn sheep are true wilderness animals whose existance depends on remoteness and distance from humans.

Both Queer Mountain & Grapevine Mountains are fine Wilderness areas which will greatly contribute to the Death Valley complex, a unique and valuable ecosystem of particular high fragility due to the arid nature of these area. These three areas are minimal wilderness recommendations, & I feel are important for balance of wilderness versus non-wilderness uses in Nevada.

Sincerely,
Glenn C. Miller

Comment Letter 40

Edward J. Duerr
2150 Plateau Way
Reno, Nevada 89512
2-17-85

Mr. Kemp Conn, District Manager
Bureau of Land Management
P.O. Box 26560
Las Vegas, Nevada 89126

Dear Mr. Conn,

In response to a recent DEIS issued for the following; Grapevine Mountains, Queer Mountain, and Silver Peak Range, I would like to support a much greater land area for wilderness consideration. Considering the beauty, remote location, and present land uses, these areas are ideal for wilderness. Having spent time camping and exploring these regions, I must support at least the following Conservationist alternative:

Grapevine Mountain WSA (66,800 acres)
Queer Mountain WSA (81,550 acres)
Silver Peak Range WSA (35,000 acres)

As a professional engineer, I am very much involved with development in Nevada. However, I also realize the

Comment Letter 40

importance of wilderness as a natural, recreational, and economic resource for our state. In order to diversify, and attract many types of people to our state we must provide alternative recreational experiances. Statistics show that, as areas become part of the national wilderness system, many more people visit and utilize these areas. Certainly, these people will also utilize many of the services and facilities Nevada has to offer. Therefore, the wilderness will not only be a natural preserve, but an important recreational and economic resource.

Please support a strong wilderness recommendation for these areas.

Sincerely,
Edward J. Duerr, P.E.

Comment Letter 41

Ann Kersten
1650 Royal Dr.
Reno, NV.
89503

Dear Mr. Conn,

I am writing in support of Wilderness recommendation for three areas in and around Death Valley National Monument:

1) Grapevine Mountain WSA (66,800 acres)
2) Queer Mountain WSA (81,550 acres)
3) Silver Peak Range WSA (35,000 acres)

The BLM's recommendation of only one-half of the Silver Peak Range is completely inadequate. All three of these areas clearly qualify for wilderness designation, and none have significant resource conflicts. In addition, all three are spectacular areas and would be an important addition to our wilderness heritage.

Thank-you.

Sincerely,

Ann Kersten

1835 Clearacre Ln
Reno NV 89512
Feb 18, 1985

Mr. Kemp Conn, Dist. Mgr.
Bureau of Land Management
PO Box 26569
Las Vegas, NV 89126

Dear Mr Conn,

This letter concerns the DEIS for the Esmeralda Wilderness areas. As I understand it you are currently recommending only about 15,000 acres of the Silver Peak Range be included as Wilderness although at least three outstanding areas deserve such designation. These include the 66,800 acre Grapevine Mountains, 81,550 acre Queer Mountain and all 35,000 acres of the Silver Peak area.

Comment Letter 42

All three of these areas clearly qualify for Wilderness status. They are at present relatively unspoiled and harbor features unique to the area. They have little potential value for development and so keeping them in their present prime pristine state is the best economic use of this land.

It will cost us little and benefit us much to preserve these areas.

As the mother of five children born either in California or Nevada I'd like to believe we can leave these areas as a heritage for generations to come.

By all means expand the recommend Wilderness area to include these areas contiguous to Death Valley Monument.

Sincerely,
Terry Wodin

Comment Letter 43

1162 Buena Vista #1
Reno, Nev 89503
Feb 19, 1985

Mr Kemp Conn, District Manager
Bureau of Land Management
P.O. Box 26569
Las Vegas, NV 89126

Dear Mr Conn,

The DEIS for the Esmeralda District regarding wilderness designation is not adequate. Both the Grapevine Mountains and the Queer Mountain WSAs are deserving of wilderness designation in addition to increasing the size of the Silver Peak Range WSA. All together I urge you to recommend at least 66,000 acres in the Grapevine Mtns, 81,000 acres in Queer Mtn and 35,000 acres in the Silver Pk Range.

Designation of these spectacular areas can only improve the quality of life for all of us who live in the western United States.

Sincerely,

Lawrence A. Dwyer

Lawrence A Dwyer

Comment Letter 44

REED FAMILY INVESTMENTS
15422 Eiffel Circle
Irvine, California 92714

February 17, 1985

Mr. Kemp Conn, District Manager
Bureau of Land Management
P.O. Box 265669
Las Vegas, Nevada 89126

Dear Mr. Conn:

I am writing you to express my support for the wilderness recommendations currently under consideration for the following wilderness study areas:

Grapevine Mountains WSA (66 800 acres)
Queer Mountains WSA (81 550 acres)
Silver Peak Range WSA (35 000 acres)

The wilderness in and around the Death Valley National Monument is a priceless part of our national heritage and I firmly believe that the inclusion of these three areas is a responsible way to enhance the protection of that heritage. It is obvious that all three areas qualify for wilderness designation. In fact, the Grapevine and Queer Mountain WSA s are such obvious extensions of the Death Valley wilderness that it is surprising they have not been so designated prior to this; by their relative location to Death Valley alone they deserve to be protected. The Silver Peak Range, on the other hand, deserves consideration not only because it is an important wilderness in its own right but also because of its herds of wild horses and bighorn sheep. I urge you to not only extend the wilderness designation to the Silver Peak Range but to include in it the maximum acreage possible.

As none of the three areas presents significant resource conflicts I am confident that you will agree in extending the wildreness designations under consideration. The best and most logical use for these areas is as protected wilderness. We have lost too much already. Please don't let these areas continue at risk.

Thank you for your consideration. I would appreciate being appraised of your views in this matter and the final decision.

Sincerely,

Paul H. Reed

Comment Letter 45

Gregory P. Ebner
14 East "I" St.
Sparks, Nv. 89431

Mr. Kemp Conn, District Manager
Bureau of Land Management
P.O. Box 26569
Las Vegas, NV 89126

Mr. Conn,

The purpose of this letter is to express my support for wilderness designation of the following WSA's in the Death Valley Region:

1) Grapevine Mtns WSA (66,800 acres)

2) Queer Mtns WSA (81,550 acres)

3) Silver Peak Range WSA (35,000 acres)

The above areas will make excellent additions to the wilderness system, and help protect the Death Valley wilderness complex.

Thank-you,

Gregory P. Ebner

February 19, 1985

Comment Letter 46

Feb 18, 1985

Mr. Kemp Conn
BLM
PO Box 265669
Las Vegas, NV 89126

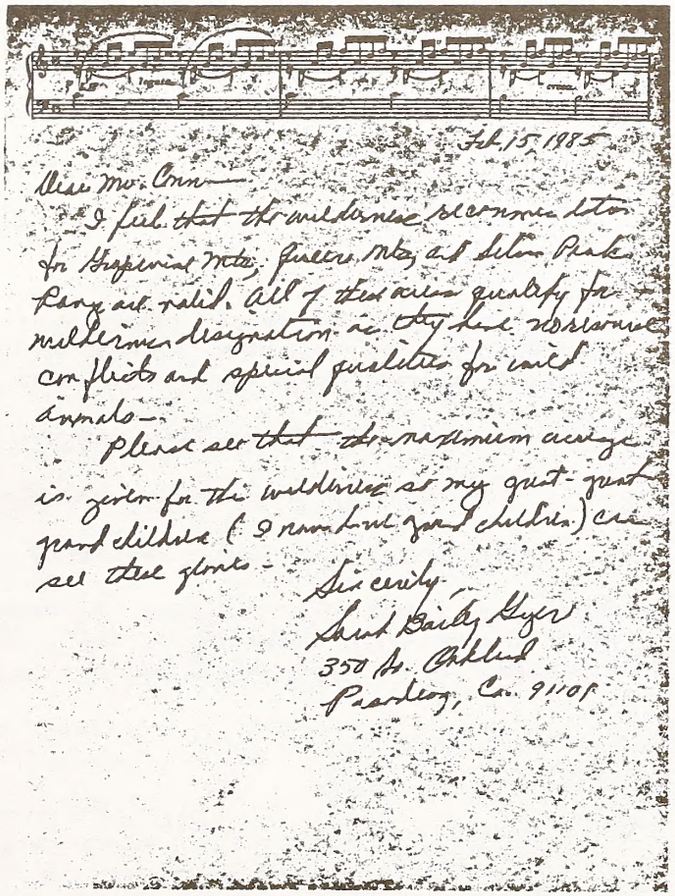
Dear Mr. Conn:

I am a Californian who loves the desert. I camp often in Anza Borego, Joshua Tree, and the Mojave. I am writing to urge you to protect more of our Californian desert lands. Please support wilderness status for the Grapevine Mountains WSA, the Silver Peak Range WSA, and Queer Mountain WSA. I understand that all of these areas are important additions to nearby wilderness areas, and none has major conflicts with other resource uses. Please do all you can to help designate these new wilderness areas. Thank you.

Sincerely,

427 Cambridge Ave
Claremont, CA 91711

Comment Letter 47



Feb. 15, 1985

Dear Mr. Conn—

I feel that the wilderness recommendation for Grapevine Mts., Queer Mt., and Silver Peak Range all should qualify for wilderness designation i.e. they have no known conflicts and special qualities for wildlife animals—

Please see that the maximum acreage is given for the wilderness as my great-great grandchildren (I now have four children) can see these places—

Sincerely,

Sarah Bailey Myers
350 So. Oakland
Pasadena, Ca. 91106

Comment Letter 48

Feb 19, 1985

Dear Friends at the BLM,

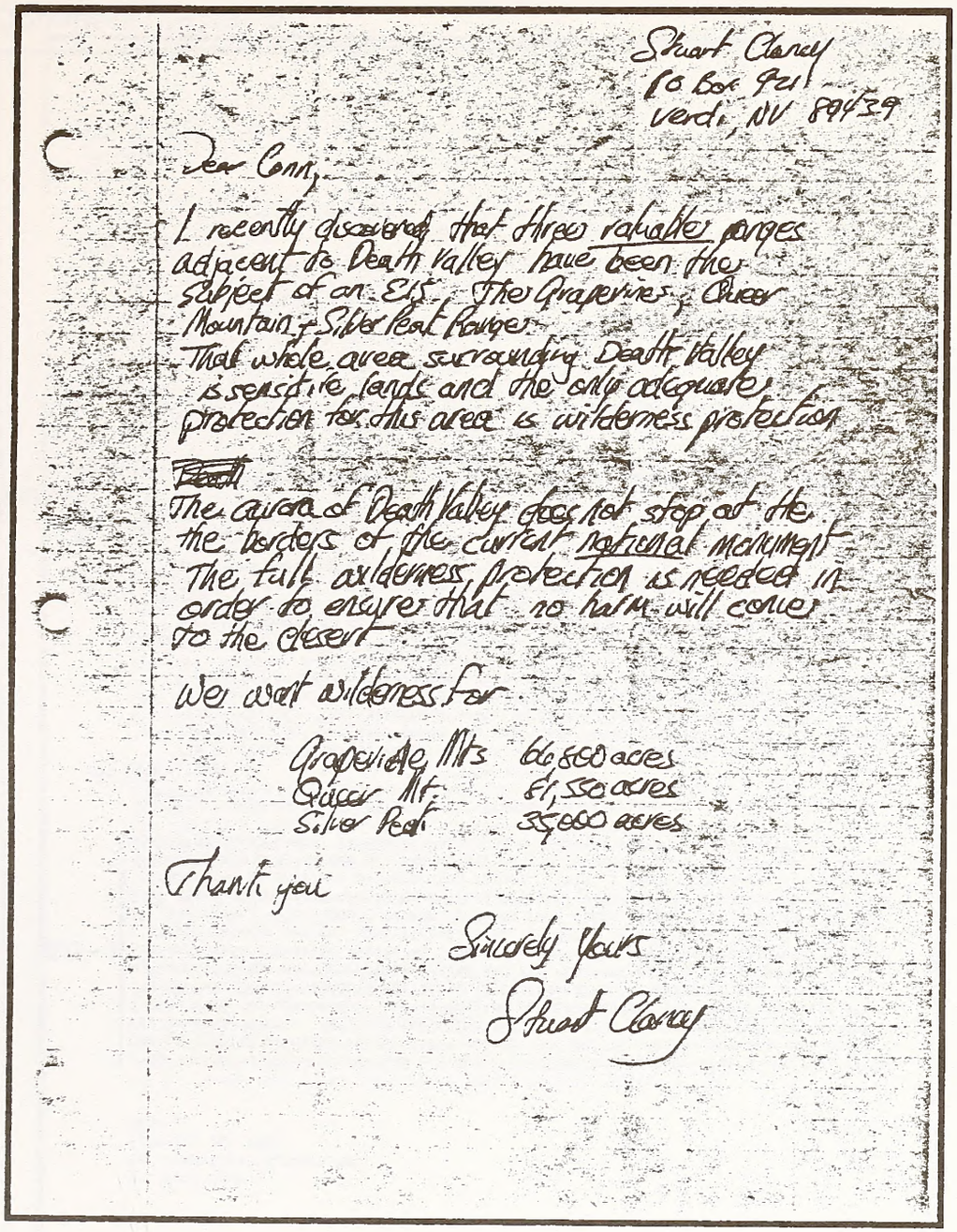
I am a native Californian. I have enjoyed hiking in many wild and beautiful places here and in Nevada all of my life. I first visited the Death Valley area with my family when I was a pre-schooler. I have always thought this area was especially wild and wonderful.

I understand that you have an opportunity to recommend some of the areas around Death Valley as wilderness areas. Grapevine Mountains, Queer Mountain, and the Silver Peak Range. I would like very much to see these areas protected, and so I encourage you to take the necessary steps to make them wildernesses.

Thank you for your kind attention to my opinions.

Lisa Faith Wood
5455 Kiowa 8
La Mesa 92041

Comment Letter 49



Stuart Clancy
P.O. Box 921
Verdi, NV 89439

Dear Conn,

I recently discovered that three valuable gorges adjacent to Death Valley have been the subject of an EIS. The Grapevines, Quartz Mountain & Silver Peak Ranges. That whole area surrounding Death Valley is sensitive, fragile and the only adequate protection for this area is wilderness protection.

~~Death~~
The aurea of Death Valley does not stop at the borders of the current national monument. The full wilderness protection is needed in order to ensure that no harm will come to the desert.

We want wilderness for:

Grapevine Mts	66,600 acres
Quartz Mt.	61,550 acres
Silver Peak	35,000 acres

Thank you

Sincerely Yours

Stuart Clancy

Comment Letter 50

February 19, 1985

Mr. Kemp Conn
District Manager, BLM
P.O. Box 26569
Las Vegas, Nevada 89126

Dear Mr. Conn:

Please include for the official record the following comments on the Esmeralda-Southern Nye Draft Resource Management Plan and Environmental Impact Statement (INT DRMP/EIS 84-60):

I feel that I am uniquely qualified to comment on the issue of wilderness in Nevada as I am a member of every responding special interest group except ranching. I am a professional geologist with work experience with the U.S.G.S. (field mapping); Hanna Mining (base and precious metal exploration); Humble Oil and Refining Co., now Exxon (geophysics). I have also been president of my own mining company, Phoenix Mineral and Mining Associates, for ten years. That company successfully carried out precious opal mining operations at Virgin Valley, Humbolt Co., Nevada for two years as well as base and precious metal exploration and property evaluation in Nevada, Alaska, and elsewhere. During the opal mining operation we had the largest mining operation in Humbolt County according to the Nevada Bureau of Mines. I feel that I am familiar with much of Nevada because of these activities.

I consider myself a conservationist, but I also do considerable field collecting of rocks and minerals and am deeply involved with regional and national rock hound organizations. I have two bad knees which prohibit extensive field work, so I cherish my ability to drive my car like an ORV into the most outlandish areas. (I've gone farther than some motorcycles and pulled jeeps out of bogs.)

Finally, my parents had three lots on Assateague Island which were taken by the U.S. Government for the National Seashore there with what I still consider to be woefully inadequate compensation. There is absolutely no question, however, that the area has been put to a much better use as a National Seashore than had it been developed in cottages. I thoroughly enjoyed my subsequent visit there.

Possibly I have written far too much about myself, but I am going to propose some things for which I thought it best to state my qualifications. The most important one is that I love Nevada very much and would consider it an honor to live there. Virtually everyone I spoke with in the area also cherishes the place, but most, in fact, are so familiar with it that they do not appreciate the uniqueness of the environment in which they live. In time, I think that they and their children will thank you for saving some portion in a degree of wilderness. The designation of Wilderness Areas seeks to preserve exactly those elements of the environment that we all cherish, whether we be ranchers, miners, rockhounds or "conservationists" (whoever they are).

I would concur that the three key management issues are important and should be dealt with. There are really four issues since land disposals and utility right of way corridors are actually separate and distinct from one another within the allowable framework of existing laws and regulations. There is no useful purpose in lumping these together unless aggravation and fanning fear and prejudice are considered useful goals. As a particularly glaring example I would cite the lumping of

Comment Letter 50

50-1 a NO GRAZING ON ANY PUBLIC LAND and ALL WILDERNESS together in Alternative C. First, the no-grazing scenario is currently illegal and not an option under the current Taylor Grazing Act. Yet repeatedly the BLM has raised this specter to arouse fear in the ranching community. The no-grazing scenario covers the entire resource area. The ALL WILDERNESS scenario applies only to five WSAs. Grazing rights in WSAs or wilderness areas are guaranteed by law and BLM regulation. The only purpose in linking these unrelated issues is a negative one -- namely to foment friction and distrust between several constituencies of the BLM. This is not a proper function of government, which should rather serve to facilitate interaction between citizens. Each issue of the four should have its own set of alternatives developed without the introduction of passions of unrelated issues. This is true because as currently presented the only thread of commonality of the issues is that the BLM has to decide something about them. It should decide them separately on their own merits.

Question: Why are the four issues not treated separately?

BLM Allegation:

The Preferred Alternative strives to balance competing demands by providing for production of needed goods and services, while protecting important environmental values. This alternative would change present management to the extent necessary to meet statutory requirements, policy commitments, and to resolve identified issues in a balanced, cost-effective manner (DEIS p 18).

Response:

The BLM appears to be woefully unprepared to make any decisions based on objective measures or observed scientific data on a number of the elements of the three issues and therefore seems to defer making decisions or making decisions based on political emotion.

Issue 3 (wildlife):

1. No condition or trend studies have been initiated in the RMP area for terrestrial wildlife habitat (DEIS p 51).

2. There is insufficient data to [illegible] deer herd distribution (DEIS p 51).

3. There is insufficient data on [illegible] range of sage grouse [illegible] assume they still inhabit historic range (DEIS p 54).

4. There is no inventory [illegible] to delineate key habitat (DEIS p 54).

Issue 3 (horses and burros):

Only aerial surveys of horses and burros (DEIS p 56).

Specific age, recruitment rate, fecundity rate, survival and mortality are nonexistent within the RMP area (DEIS p 56).

Comment Letter 50

Issue 3 (livestock)

1. Site specific data on riparian vegetation are unknown (DEIS p 46).
2. The apparent trend of ecological sites was estimated once (DEIS p 44).
3. This "trend" was supplemented by four years of cover trend data from nine permanent photo plots in one allotment (DEIS p 44).

Issue 1 (mineral conflict)

1. No detailed minerals inventory exists for each of the five WSAs (DEIS p 151).

Issue 1 (manageability)

1. There are no direct data on compliance with ORV restrictions as they have not been tried in the WSAs.
2. There has been no effort made to gain compliance with ORV restrictions as they have not been tried in the WSAs.

50-2 Question: Why is the BLM so uninformed about its own range?

Question: How can BLM make balanced management decisions without critical basic scientific data relating directly to those decisions?

Question: Where is the balance in 17850 acres for wilderness and approximately 781,440 acres for utility corridors? This amounts to about 0.5% of the RA for wilderness and 21% of the entire RA for utility corridors.

50-3 Question: Where is the balance in 0.5% of the total RA for wilderness and 99.4% of the total RA completely open for mineral entry?

Question: Where is the balance in 17,850 acres for wilderness and 94,949 acres to be sold?

BLM Allegation:

Designation of the Pigeon Spring WSA will not occur unless the contiguous California Desert Conservation Area WSA, Sylvania Mountains, is also designated. Pigeon Spring does not meet the wilderness criteria for size and outstanding opportunities for solitude and primitive recreation except when considered in conjunction with the California unit (DEIS p 147).

Response:

I concur with respect to the issue of size but not with respect to wilderness value. It should be part of the CDCA unit.

50-4 Question: Why is the Pigeon Spring WSA treated separately?

Question: Why is this WSA not simply a part of the Sylvania Mountains WSA?

Comment Letter 50

BLM Allegation:
"Designation of the Resting Spring WSA will not occur unless the contiguous California Desert Conservation Area WSA (Resting Spring Range WSA, No. 145), is also designated. Resting Spring (Nevada) does not meet the wilderness criteria for size and outstanding opportunities for solitude and primitive recreation except when considered in conjunction with the California unit." (DEIS p 149).

Response:
I concur with respect to the issue of size but not with respect to wilderness value. It should be part of the CDCA unit.

50-5 Question: Why is the Resting Spring WSA (Nevada) treated separately from the contiguous CDCA unit?

Question: Why is the Resting Spring WSA (Nevada) not simply part of the Resting Spring WSA (California)?

BLM Allegation: (Grapevine Mountains)
"The entire 66,800 acres within this WSA are recommended as non-suitable for wilderness designation. The southern one-third of the mountainous portion of the WSA has a moderate potential for metallic minerals, and the entire WSA has a moderate potential for geothermal resources. The area contains only moderate wilderness values supported primarily by outstanding opportunities for solitude. Motorized vehicle access across the gentle valley terrain of the WSA would adversely affect the BLM's ability to manage the area as wilderness over the long term." (DEIS - Preferred Alternative - p 18.)

Response: of Grapevine Mountains
"Under (Alternative B) 23150 acres would be recommended as suitable. The boundary of the suitable area follows topographic lines around the base of the range and includes all of the mountains. The 43,650 acres that are not recommended under this alternative are the bajadas on the northwest and northeast periphery of the WSA." (DEIS p 134)

"The designated portion includes most of the key features of the WSA. The boundary can be located and is manageable." (DEIS p 134)

Concerning the portions of Silver Peak, Grapevine, and Queer Mountain WSAs found suitable in Alternative B: "Although the 99420 acres of public lands that would be recommended as suitable for wilderness designation under this alternative (B) have minimal manageability problems resulting from ORV access or mining claims, it could be expected that opposition to the suitable recommendations would be immediate and intense, especially from the mining sector. This negative response would probably focus on the minerals potential in the Silver Peak Range WSA (DEIS p 138) (emphasis added).

Comment Letter 50

"Implementation of this Alternative (C) would be a significant beneficial impact as far as preserving and protecting the wilderness resource for future generations is concerned"(DEIS p 151).

50-6 Question: Since there are 23150 acres of prime wilderness area with a manageable and locateable boundary and minimal manageability problems resulting from ORV access or mining claims has been identified in Alternative B, why is this acreage for the Grapevine Mtns. not included in the Preferred Alternative?

Question: What has comment from the mining community or anyone else concerning Silver Peak to do with the Grapevine Mtns. WSA?

50-7 Question: How can the BLM arrive at the conclusion that a portion of the Grapevine Mtns. WSA has a moderate mineral potential (which it does not) (DEIS p 18 and elsewhere) when "no detailed minerals inventory exists for each of the five WSAs"? (DEIS p 151)

BLM Allegation:
"The entire 81,550 acres within this WSA (Queer Mountain) are recommended as non-suitable for wilderness designation. The northwest, northeast and southeast portions of the WSA have a moderate potential for metallic minerals. The entire WSA also has a moderate potential for geothermal resources. The area contains only moderate wilderness values, supported primarily by outstanding opportunities for solitude. Management of the entire area as wilderness over the long term cannot be assured due to the potential for development of valid mining claims in the northern portion of the WSA and the ease of motorized vehicle access throughout most of the WSA." (DEIS p 18).

Response:
"Under this alternative (B) 42650 acres (of the Queer Mountain WSA) would be recommended as suitable. The suitable area encompasses the southern three-quarters of the mountainous portion of the WSA. The boundary of the suitable area follows topographic lines, natural features, and the California border." (DEIS p 135)

Concerning the Queer Mountain, Grapevine Mountain, and Silver Peak WSA portions found suitable in Alternative B: "...the 99420 acres of public lands that would be recommended as suitable for wilderness designation have minimal manageability problems resulting from ORV access or mining claims..." (DEIS p 138).

I am unaware or ANY validated mining claims within the WSA. There are mining claims which might prove valid upon examination, but none have been validated to my knowledge at this time.

50-8 Question: Have any claims been validated in the Queer Mountains WSA?

50-9 Question: Since a coherent block of 42650 acres of the Queer Mountain WSA with definable boundaries which can be found on the ground and having minimal manageability problems resulting from ORV access or mining claims has been set forth in Alternative B, why is this acreage not included in the Preferred Alternative?

BLM Allegation:

"A central core area totalling 17850 acres (of the Silver Peak Range), which possesses high wilderness values is recommended as suitable for wilderness designation. The addition of 1134 acres of public land at the mouth of Icehouse Canyon along the northwest side of the WSA improves the management situation of the area by establishing an easily recognizable boundary based on topography. The remainder of 17184 acres is recommended as non-suitable for wilderness designation due to the moderate and high potential for metallic minerals and geothermal resources as well as to avoid potential conflicts with mining claims along the periphery of the WSA." (DEIS p 19)

Response:

Under Alternative B "33620 acres (of the Silver Peak Range) would be recommended as suitable including 3065 acres that were not part of the original WSA. This added area is primarily in the northwest corner of the WSA, including the lower end of Icehouse Canyon and the northwest escarpment. Additional acreage would be added in the southern part of the WSA to within 200 feet of the McAfee Canyon Road. The boundary of the suitable area follows topographic lines or roads. The 3345 acres that would be recommended as non-suitable are primarily in Piper Canyon along the west boundary. Additional acreage would be deleted on the fringe of the WSA along the eastern boundary. The designated portion is remarkably pristine. Opportunities for day hiking and backpacking are outstanding because of the designated portions' varied topography, attractive rock formations, diverse plant communities, water, wildlife, outstanding views and varieties of destinations. Other primitive recreation activities are of a high quality. The portion added to the original WSA would increase wilderness benefits by adding wilderness values and by creating a manageable boundary. Due to the rugged topography, it all adds up to the outstanding opportunities for solitude found in the designated area. These acres also contribute to the outstanding opportunities for primitive recreation by protecting areas, particularly the lower end of Icehouse Canyon, which would be part of dayhikes or backpacks into the original WSA. The added areas contain springs, riparian acreas, sheep habitat, and colorful and rugged cliffs which all add to the value of the recreation experience. (DEIS p 135/6)

The boundary of the designated area can be located on the ground and consequently would be manageable. (DEIS p 136)

It would be appropriate here to discuss the matter of "mineral" potential. The definitions used here for high, medium and low potential may be found in the DEIS Glossary, p. 195. The terms seek to define favorability for accumulation of a mineral resource. A resource is a net asset, a place in this case, which can produce mineral wealth at a profit. This is a mine. Mines compete with

respect to local, regional and most especially with world market resources for the material mined. An area's potential must be evaluated in this context -- its ability to produce a viable mine.

This is not the context in which especially "moderate" potential is used in the DEIS. If favorable rocks can be inferred to be questionably associated with a pluton some miles away in areas of often intense faulting -- they are held to be moderately favorable (see the discussion of the granitic rocks of Helmet Mtn. in the Grapevine WSA, DEIS p 62). This is ridiculous!

As to the assertion of moderate (let alone high) mineral potential for broad areas of each WSA, one needs to critically examine the definition (DEIS p. 195). The geologic environment need only consist of being in the hills or mountains as opposed to the intermontane basins. The inferred geologic processes or hydrothermal emplacement, contact replacement, or regional metamorphism of syngenetic deposits can be widespread without leading to any economically significant concentrations of metals. None of these processes (or any other) is specifically claimed to be present within a WSA. They just might be. A reported mineral occurrence is just that. Someone reports (often erroneously) that there is a particular mineral present. In and of itself this has absolutely no economic significance for production. Mineral occurrences do not make mines. Moderate potential for a mine requires a known mineral deposit, i.e., large enough reserves of sufficient grade to warrant extraction at a profit or near a profit. The way the definition reads, all the hills and mountains (as opposed to the intermontane valleys) would have moderate potential. What we need to know is how the area of the WSA compares with the adjacent area, and similar areas regionally, nationally, and world-wide with respect to potential production.

There are no known areas of high mineral potential even as defined in the Glossary within the Silver Peak WSA because nowhere in the DEIS is there a mention of evidence for a mine, mineral reserves or even a known deposit within the WSA. The closest is the block of Sunshine Mining claims outside the WSA east of Mud Spring. In the acreage proposed in Alternative B the boundary has been pulled back to avoid conflict with these claims.

It is particularly difficult to comprehend how such claims of moderate and high mineral potential can be put forth WITHOUT A DETAILED MINERAL SURVEY (DEIS p 151)!

Once again it is necessary to quote "...the 99420 acres of public lands that would be recommended as suitable for wilderness designation under this alternative (B) have minimal manageability problems resulting from ORV access or mining claims..." (DEIS p 138).

50-10 Question: Why is this amended acreage under Alternative B not included in the Preferred Alternative?

Comment Letter 50

BLM Allegation:
It is crucial to the survival of bighorn in the planning area that critical summer use areas within a two-mile radius of water sources remain relatively undisturbed (DEIS p 51).

Response: I concur.

50-11 Question: Why is this factor barely mentioned with respect to the Silver Peak WSA and not considered at all for the Grapevine Mountains and Queen Mountain WSAs? According to the Preferred Alternative, the sheep are to be reintroduced in these two WSAs (DEIS p 151 and elsewhere).

BLM Allegation:
No significant impacts to the area economy would occur as a result of [full] wilderness designation (DEIS Alternative C, p 151).

Response:
I concur. The real issue is stated very clearly in Alternative C, DEIS p. 151: "Recommending all five wilderness study areas as suitable for wilderness designation would probably be considered a significant adverse impact by many individuals and stakeholder groups, especially those who are mining sector oriented. In terms of opportunities foregone, this could be a significant adverse impact to the communities if those areas include mineral deposits of viable economic value. However, since no detailed minerals inventory exists for each of the five WSAs, this is speculative and not quantifiable. However, implementation of this aspect of this alternative would be a significant beneficial impact as far as preserving and protecting the wilderness resource for future generations is concerned." [Emphasis added.]

That is the problem in a nutshell. Answers can possibly be had from the USGS if these three WSAs (Grapevine, Silver Peak, Queer Mtn.) are recommended as suitable and they do the prescribed minerals survey.

As no mineral data are available from surveys, no acreage should be deleted for assumed mineral value. As no implementation of any ORV restrictions have been tried and these areas nave been kept essentially pristine for 75 years of vehicular use, no acreage should be deleted for potential ORV abuse. I recommend full recommendation for Grapevine and Queer Mountain and Alternative B for Silver Peak.

Sincerely,

Paul Clifford

Paul Clifford
2955 Berkshire
Cleveland Heights, Ohio 44118

Comment Letter 51

Sunshine Mining Company
Silver Peak Operations
P.O. BOX 97 PHONE: Area Code (702) 937-2282
Silver Peak, Nevada
89047

February 15, 1985

Mr. Kemp Conn, District Manager
Bureau of Land Management
P.O.Box 26569
Las Vegas, Nevada 89126

Dear Mr. Conn:

In response to the conclusions and general content of the Esmeralda-Southern Nye Planning Area Draft Resource Management Plan and Environmental Impact Statement, Sunshine Mining Company strongly contends that the BLM has failed in its lawful obligations to the citizens of the United States, particularly those of the State of Nevada and Esmeralda and southern Nye Counties. This failure has resulted in an inadequate and invalid Resource Management Plan and Environmental Impact Statement (hereafter RMP-EIS) due to the following omissions and/or errors:

I) Failure to adequately assess the mineral potential of the proposed Silver Peak Wilderness Study Area.
II) Disregard of majority public comments gathered during the scoping process.
III) Unsupported allegations and errors in facts.
IV) Disregard of the recommendations contained in the April, 1980 Proposed Wilderness Study Areas, Nevada BLM Intensive Wilderness Inventory.

The above contentions are addressed in the order listed. All page numbers, chapter numbers, and section titles refer to the Draft Esmeralda - Southern Nye Planning Area Resource Management Plan and Environmental Impact Statement.

I) Failure To Adequately Assess The Mineral Potential Of The Prooosed Silver Peak Wilderness Study Area.

Page 64 states that "another area constituting 74 oercent of the WSA is classified as having a moderate potential for minerals." Recent modification of the criteria for assessing the mineral potential of Wilderness Study Areas (WSA's), as approved by Robert Burford, Director, U.S.Bureau of Land Management, is understood to include the following language:

In order for an area to be classified as having high potential for mineral resources, the following criteria must be met:

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"The geologic environment, the inferred geologic processes, the reoorted mineral occurrences and/or valid geochemical/geophysical anomalies, and the known mines or deposits indicate high favorability for accumulation of mineral resources. The known mines or deposits do not have to be within an area which is being classified, but have to be in the same type of geologic environment."

The portions of the above oaragraph underlined in red are those portions which have been modified, as approved by Mr. Burford.

The existence of a Tertiary volcanic caldera complex located within and to the east of the Wilderness Study Area Alternative A boundaries was first emphasized in the literature by Paul Robinson of the U.S.Geological Survey. The general outline of the caldera is shown on Map A, and is taken directly from the Geologic Map of the Rhyolite Ridge Quadrangle, Esmeralda County, Nevada, (Paul T. Robinson, John H. Stewart, Richard J. Moiola, and John P. Albers), and the Geologic Map of the Piper Peak Quadrangle, Esmeralda County, Nevada (John H. Stewart, Paul T. Robinson, John P. Albers, and Dwight F. Crowder). As emphasized in earlier written comments to the BLM concerning this area, caldera complexes of this type are known and well-documented sources for major mineral deposits. The similarity of the Silver Peak Caldera with other caldera systems in the western U.S. is striking. Map B shows the Silverton Caldera, located in southwestern Colorado (taken from W.S.Burbank, 1947, The San Juan Region - General Features, in Vanderwilt, J.W., Mineral Resources of Colorado: Denver, Colo., Colorado Mineral Resources Board, p. 396-408). The strong NW-SE trending structures shown on this map contain the Au - Ag - Pb - Cu - Zn vein deposits which have been mined for almost 100 years. Robinson et al mapped a similar strong structure system in and around the Silver Peak caldera, but without strong fissure filling. The explanation for this lack of surface exposure of hydrothermal vein material is that the Silver Peak caldera complex had a late episode of activity which deposited a sequence of latite flows over the area. These latites effectively capped mineralized veins which were present, obscurring their outcrop. The major veins a short distance to the east which have production histories (particularly the Nivloc and Sixteen-to-One Mines) lie in an area where either the latites were never deposited or have been eroded away - thus the vein outcrops are visible. Post - latite collapse of the caldera system re-established the strong NE-SW structure trend mapped by Robinso- et al, and subsequent local hydrothermal activity deposited fissure fillings (Mohawk and Sanger Veins) and anomalous metal mineralization (Mud Springs, Argentite Canyon).

Other calderas display the same structural similarities as the Silver Peak Caldera. Some of these to name a few are the Lake City Caldera, Creede Caldera, and Summitville Caldera. The literature contains numerous papers which cover these complexes.

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Anomalous mineralization both in and adjacent to the Silver Peak WSA has been documented by Sunshine Mining Company in earlier written comments to the BLM. Recent soil sampling on Sunshine's Mud Springs claim grouo reinforced the geochemical anomaly reported earlier. Analysis for 10 elements (Au, Ag, Pb, Cu, Zn, Hg, As, Sb, Tl, Mo) indicate anomalous amounts of Antimony (Sb - up to 34.61 ppm), Mercury (Hg - up to 0.9753 ppm), Thallium (Tl - up to 3.56 ppm), and Arsenic (As - up to 64.07 ppm). The trend of these anomalies is generally east-west as shown on Map C (with overlays), and projects directly into the WSA immediately to tne west. All four metals showing anomalous values are tyoical indicators of eoithermal precious metal deposits. Of oarticular interest is the thallium anomaly - thallium has only recently been shown to be an indicator of orecious metal deposits (re: Ikramuddin, M, et al, Thallium - A Potential Guide to Mineral Deposits - included in Appendix).

Virtually all of the hard technical data on the mineral potential of the proposed Silver Peak WSA has oeen supplied to the BLM by Sunshine Mining Company. The area's rugged terrain and poor accessibility together with its present land status has no doubt discouraged previous geologic work by private industry. It must oe emphasized that it is not common practice for a mining company to divulge hard geologic and geochemical data to the Federal Government for any reason. Sunshine has chosen to do so because we strongly contend that this area has high potential for mineral resources. Considering the new guidelines for assessment of mineral resource potential approved by Mr. Burford, assignment of a high potential for mineral resources is the only possible conclusion, unless the factual data presented is virtually ignored.

II) Disregard Of Majority Public Comments Gathered During The Scoping Process

It is apparent to Sunshine Mining Company after reviewing the RMP-EIS that the BLM is attempting to force upon the people of Nevada, and in oarticular the residents of Esmeralda County, a plan with conclusions which were formulated with obvious disregard for the majority of the comments and concerns submitted by the public during the scoping process.

The following specific examples support this contention. All page numbers and chapters refer to the Draft Esmeralda - Southern Nye Planning Area Resource Management Plan and Environmental Impact Statement.

51-1

1) Page 76, Chapter 4, Social Values, Wilderness: The final paragraph of this section states that "Although no input was received ouring the scoping process from individuals or stakeholder groups who are prooonents of wilderness, it can be expected that their positions have changed little, if at all, from the oositive supoort given the wilderness program in the initial, intensive inventory ohase." This statement is an injustice to the individuals and companies who diligently attended the public hearings and submitted written comments during the scoping process. The BLM has no right or authority to make this assumption for proponents of wilderness. By doing so, the BLM is acting as a guardian for the views of these individuals and stakeholders.

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Other sentences and phrases in this section which illustrate the sympathetic leaning of the RMP-EIS authors towards wilderness proponents include "Any program that placed or has the potential of placing constraints on minerals development activities is viewed by the mining sector with apprehension if not alarm!" While many in the mining industry might agree with this statement, the inclusion of the exclamation point by the RMP-EIS authors implies that such a belief is contrary to generally accepted thought. Also, the inclusion of a portion of a submitted letter in this section which states "Locally, there is resentment of the suggestion that any publicly owned open spaces should be encumbered by regulations against particular uses. Unregulated public access to these lands is jealously guarded as a birthright." (Nevada Division of State Parks, letter to Area Manager, dated April 4, 1983)" helps to set the tone in this section that individuals who endorse the concept of multiple use are unreasonable, perhaps selfish.

In summary, while admitting on page 76 that "the majority of the comments received from residents of Planning Area A place the recreational values" of the possible WSA's "in the below average to poor category", much of the remaining text is used to set a tone of derision for comments and views supporting multiple use of the area.

2) Pages 74 & 75, Chapter 4, Wilderness - Silver Peak Range WSA: This 1½ page section contains only a lengthy, flowing, "flowery" description of the wilderness characteristics, using such descriptive phrases as "colorful formations of white, pink, and green tuffs", "lush riparian areas", "attractive rock formations", and "high interest animals". Superlative adjectives such as "outstanding", "excellent", "remarkable", and "distinctive" are used repeatedly. This entire section is an example of the obvious bias of the RMP-EIS authors. No support for this description is offered in the form of public comment excerpts. By comparison, the section on page 64 which discusses the mineral potential of the proposed Silver Peak Range WSA contains no such superlative adjectives and virtually no mention of the written public comments supporting a high potential assessment for mineral potential. Such obvious bias on the part of the RMP-EIS authors is unprofessional and without defense.

III) Unsupported Allegations And Factual Errors

The RMP-EIS contains numerous unsupported allegations and factual errors which are misleading to a reader. Most of these errors and allegations conveniently support the recommended alternatives of the plan. Examples are:

51-2 1) Page 41, Chapter 3, Affected Environments, Cultural Resources: The final paragraph in this section states, "There is a constant attrition of these resources as surface disturbing activities relating to mining, ranching, farming, and the like take their toll. Some extremely important sites are being destroyed or extensively damaged with little regard to cultural values." This statement is very serious in that it states that mining and agricultural concerns are destroying "extremely important"

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cultural sites. Sunshine Mining Company demands that this statement be removed from the plan, as no support or proof of these allegations is included. Such a statement is only self-serving to the authors of the RMP-EIS, and appears to be an effort to discredit the industries of Esmeralda County in the eyes of the public at large.

51-3 2) Page 65, Chapter 3, Wilderness, Diversity Criteria: The third paragraph of this section states, "The State of Nevada is underrepresented in the NWPS with only one designated area, the Jarbidge Wilderness, on the Oregon border." This statement must be removed from the plan. The statutes (Public Law 94-579, 94th Congress, October 21, 1976, Title VI - Designated Management Areas, Section 603, Bureau of Land Management Wilderness Study) do not provide that a state must be "adequately represented" in the NWPS. The inclusion of this statement in the plan is yet another effort by the RMP-EIS authors to streamline support of Preferred Alternative A.

51-4 3) Page 81, Chapter 3, Economic Conditions, Mining: The importance of mining and its impact on employment, income, and social values of the area are sorely understated in this brief section. In 1983, Sunshine Mining Company produced over $16 million worth of minerals. In addition, other small mines in the area have come on line since 1980 and contributed significantly to mineral production in the county. According to the Nevada Dept. of Taxation, in 1983 the mines in Esmeralda County contributed over $15 million in net proceeds of mines taxed, compared to only $7.2 million in 1980 (a copy of the 1983-84 report on Net Proceeds of Mines by the Department of Taxation is included in the Appendix of these comments). The above figures indicate that the figures reported in the RMP-EIS should roughly be doubled to show a realistic picture of the importance of mining in the plan area.

51-5 4) Page 102, Chapter 4, Economic Conditions, Wilderness: The first paragraph of this section states, "No significant impact to the area economy would occur as a result of wilderness designation". This statement is astounding, considering the documented high potential for mineral resources discussed earlier, as well as the importance of mining to the county economy and tax base, so clearly shown in the previous comment. The statement is even in direct conflict with a paragraph on the same page of the RMP-EIS, which states "inclusion of those acres of favorable metallic mineral potential within the area recommended as suitable for wilderness designation could, for the minerals industry as well as the adjacent communities, represent an opportunity foregone. This would be an adverse impact, perhaps significantly so. Due to the paucity of site specific data, it is impossible to quantify at this point in time."

As time passes and the orebodies presently being mined adjacent to the Silver Peak Range WSA are exhausted, development of the mineral potential of the WSA will be inevitable. The plan admits that "inclusion of those acres of favorable mineral potential within the area" into the proposed WSA could "represent an opportunity foregone", and result in "an adverse

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impact, perhaps significantly so". After recognizing the economic consequences of inclusion of the area as proposed wilderness, to then recommend the area as such and blithely brush aside the consequences is a blatant example of omission of factual data which does not support the RMP-EIS authors' preconceived conclusions.

51-6 5) Page 76, Chapter 3, Wilderness, Silver Peak Range WSA: The last paragraph of this section states, "Mineral development concerns are minimal because only 186 acres of mining claims and no leases are located in the WSA." The only factual portion of this statement deals with the lack of mining claims and leases in the proposed WSA. The bulk of the text of Sunshine Mining Company's comments has dealt with the mineral potential of the area. To conclude that no potential exists for mineral development based on a physical lack of mining claims is a totally false assumption. As discussed previously, much of the proposed WSA is overlain by young Tertiary latites which cap underlying vein systems and mineralization. Any claim located on ground which contains no evidence of a mineral discovery is, by law, void. The present status of this area (ie., proposed WSA) precludes any company from locating claims and attempting to drill beneath the latite cap rock. The authors of this section of the RMP-EIS will no doubt be quick to point out that the present land status of the area does not prohibit location and assessment of mining claims within the area. However, it is hard to imagine these individuals supporting the construction of drill sites and roads in this "remarkable pristine" area, among the "colorful formations of white, pink, and green tuffs", frightening the "high interest animals". In reality, this area is off limits to further meaningful mineral evaluation under its present status.

IV) Disregard Of The Recommendations Contained In The April, 1980 Proposed Wilderness Study Areas, Nevada BLM Intensive Wilderness Inventory.

The initial Nevada BLM Intensive Wilderness Inventory study recommended in the April, 1980 report entitled "Proposed Wilderness Study Areas" on page 303 that for the area which includes the present proposed Silver Peak Range WSA, "Zero acres are recommended for Wilderness Study Area status", "72,779 acres should be dropped from further wilderness consideration". The rationale for recommendation was: "Although a portion of this unit contains more than 5,000 acres of contiguous public land that generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable, neither outstanding opportunities for solitude nor a primitive and unconfined type of recreation are present."

51-7 Between April, 1980 and the present time, the BLM has disregarded its original recommendation, and subsequently changed its views on the wilderness characteristics of the area. Since it is unlikely that the area has physically improved during this short time, it is reasonable to assume that this about face on the part of the BLM is due primarily to the influence of wilderness proponents within the BLM itself, supported by selective utilization of public input

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Sunshine Mining Company
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gathered during the scoping process. Sunshine Mining Company strongly opposes this method of planning - it is a gross disservice to the people of the state of Nevada.

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In summary, Sunshine Mining Company contends that the potential for mineral resources within the proposed Silver Peak Range WSA must be changed to "high", based upon the evidence presented in these and previous comments. Sunshine also strongly contends that the RMP-EIS is flagrantly biased in support of Preferred Alternative A, containing misinformation, unsupported allegations, errant facts, and selective utilization of public comment. By disregarding the majority of the comments generated by Esmeralda and Nye County residents during the scoping process, the resulting RMP-EIS represents primarily the pro-wilderness opinions of certain authors of the plan. Because of this bias, Sunshine contends that the present plan must be revised, with the revision deleting the false information itemized in these comments. Also, based upon the geologic evidence and data presented in Section I, the Preferred Alternative for the Silver Peak Range must be changed to "No Action".

For Sunshine Mining Company,

Allan R. Young

Allan R. Young
Resident Manager
Silver Peak Operations

Donald F. Earnest

Donald F. Earnest
Chief Geologist
Silver Peak Operations

ARY;DFE/dv

Comment Letter 52

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Paramount Pictures
Freddie Fields
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Jean Firstenberg (Ex Officio)
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The American Film Institute
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Michael Fuchs
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Richard Gelfond
President and
Chief Operating Officer
Columbia Pictures Industries, Inc.
Ina Ginsburg
Washington Editor, Interview
Mark Goodson
Goodson-Todman Productions
J. Ronald Greer
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Sherry Lansing
Jaffe-Lansing Productions
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Harry C. McPherson
Partner, Verner, Liipfert,
Bernhard and McPherson
Marsha Mason, Actress
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Chairman of the Board and
President
Grey Advertising Inc.
Ronald W. Miller
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Chief Executive Officer
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Macie Nehsfeld
Macie Neufeld Productions, Inc.
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President
Creative Artists Agency, Inc.
Ted Perry, Professor
Middlebury College
Eric Pleskow, President
Orion Pictures Corporation
Frank Price
Chairman
MCA Motion Picture Group
Robert Rehme
Co-Chairman and
Chief Executive Officer
New World Pictures
Joan H. Resnick, President
National Association of Theatre Owners
Executive Vice President
American Multi-Cinema, Inc.
Wayne Rogers, Actor
Aaron Spelling
President and
Chief Executive Officer
Aaron Spelling Productions, Inc.
Donald Sutherland, Actor
Anthony Thomopoulos
President, ABC Broadcast Group
Grant A. Tinker
Chairman of the Board and
Chief Executive Officer
National Broadcasting Company
Jack Valenti
President, Motion Picture
Association of America
David L. Wolper, President
David L. Wolper Productions, Inc.
Bonita Granville Wrather
Vice President
Wrather Corporation
Bud Yorkin, Producer/Director

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The American Film Institute

Mr. Kemp Conn
District Manager
Bureau of Land Management
P.O. Box 265669
Las Vegas, NV 89126

2/19/85

Dear Mr. Conn,

I wanted to make some comments on wilderness proposals within your district. I believe that Grapevine Mountains, Queer Mountain and the Silver Peak Range all clearly qualify for wilderness designation.

The Grapevine Mountains and Queer Mountain wilderness study areas are logical extensions of the Death Valley area and should thus be protected.

None of the three areas have significant resource conflicts - wilderness is the best use for them. Grapevine is virtually untouched by man, it offers exceptional opportunities for solitude. Queer too is wild and untouched. As for the Silver Peak Range, along with its spectacular scenery and high quality wilderness is its importance to large herds of bighorn sheep and wild horses. The maximum acreage here should be designated as wilderness (35,000 acres).

I appreciate the opportunity to make comments. Thanks for your time.

Sincerely,

Thomas Bliss
Sony Video Center

Comment Letter 53

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

February 21, 1985

Mr. Kemp Conn
District Manager
U.S. Bureau of Land Management
P.O. Box 26569
Las Vegas, Nevada 89126

Dear Mr. Conn:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled RESOURCE MANAGEMENT PLAN FOR THE ESMERALDA-SOUTHERN NYE PLANNING AREA, ESMERALDA AND NYE COUNTIES, NEVADA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of Rating Definitions and Follow-Up Action"). This DEIS is rated EC-2 because 1) clarification of Wilderness Study Area criteria is requested, 2) water quality and air quality issues need to be addressed, and 3) herbicide use must be discussed. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send five copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Patrick J. Cotter, Federal Activities Branch, at (415) 974-0948 or FTS 454-0948.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

Enclosure (3 pages)

Comment Letter 53

General Comments

Establishment of wilderness areas can benefit other resource and environmental values such as water quality and air quality. Designation of suitable land as "wilderness areas" tends to be environmentally preferable since it often affords a greater level of environmental protection. Accordingly, we have the following specific comments about the wilderness selection criteria in the DEIS.

53-1 1. The rationale for the Bureau of Land Management's "nonsuitable" declaration of Wilderness Study Areas (WSA) is unclear. The specific WSAs include Grapevine Mountain, Queer Mountain and the Silver Peak Range.

53-2 a. The FEIS should document active and potential mineral claims, either metallic, nonmetallic, oil and gas, or geothermal, that preclude suitable declarations in the WSAs.

b. Areas where off-road vehicle (ORV) use is substantial within a WSA should also be included in the disclosure of nonsuitable areas.

53-3 2. The description of Alternative B presents arguments for suitable areas that are potentially manageable under BLM's authority. The FEIS should identify the criteria used to select suitable wilderness area in the Preferred Alternative (17,850 acres) versus Alternative B (99,420 acres). Pages 60-76 of the DEIS suggest that larger areas of the WSAs are suitable for wilderness designation.

Water Quality Comments

53-4 1. Water quality is addressed generally by referring to a Memorandum of Understanding (MOU) between BLM and the Nevada Division of Environmental Protection. A copy of this MOU should be included in the FEIS as an appendix. Implementation of the MOU and protection of water quality through this agreement should be discussed in the FEIS.

53-5 2. The FEIS should provide baseline information and a detailed map of water resources within the resource area. The FEIS should discuss the following factors indicating management measures to protect water quality:

a. Springs and wells,

b. Ponds and reservoirs,

c. Perennial streams and hydrographic basins, and

d. Riparian communities.

Comment Letter 53

53-6 3. Mitigation should be addressed in the FEIS, where possible, to provide adequate protection for water quality and maintenance of beneficial uses for each water resource listed above, especially riparian communities.

Air Quality Comment

53-7 The FEIS should provide baseline information for existing air quality in the resource area.

Herbicide Comments

53-8 1. The DEIS mentions an MOU between BLM and the Nevada Department of Wildlife which specifies procedures to be used for sagebrush alteration. This MOU should be summarized or included as an appendix in the FEIS.

2. There is only one sentence citing the use of herbicides for treatment of sagebrush areas (p. 15). The FEIS should explain the process that must be completed before herbicide application can begin.

3. The FEIS should discuss how Southern Oregon Citizens Against Toxic Spraying v. Clark (720 F.2d 1475 [1983]) will affect herbicide spraying programs in the resource area.

Comment Letter 54

Mr. Kemp Conn, Dist Mgr. 2/18/85
Bureau of Land Management
P.O. Box 26569
Las Vegas, Nv 89126

Dear Mr. Kemp Conn:

I am concerned about the protection and preservation of the desert lands that surround Death Valley namely the Grapevine Mountains, Queer Mountain and the Silver Peak Range. I understand that your recommendation for wilderness status is considerably reduced from those proposed by concerned conservation groups. I also understand that these lands are not being sought after for natural resources and thus the best use for them would be in a state of protection.

Habitat for bighorn sheep is shrinking in the southwest. The Silver Peak Range provides sustenance to a large herd. Please review your acreage and recommend the full 35,000 for wilderness status.

Thank you.

Sincerely,
Alison Hutchings

Comment Letter 55

February 16, 1985

Mr. Kemp Conn, District Manager
Bureau of Land Management
PO Box 265669
Las Vegas, NV 89126

Dear Mr. Conn:

This letter is to urge you to support wilderness status for the following areas:

1. Grapevine Mountains WSA
2. Queer Mountain WSA
3. Silver Peak Range WSA

These outstanding areas need to be protected and preserved. All three areas within the California Desert qualify for the designation"wilderness", and Queer Mtn. and Silver Peak are logical extensions of the Death Valley wilderness complex.

I recommend maximum acreage in the Silver Peak area due to the importance of bighorn sheep and wild horses.

Please think of the future when you consider these propositions. We cannot afford to let our land be misused or abused. Wilderness is essential to our way of life.

Thank you.

Sincerely,

Comment Letter 56

February 16, 1985

Mr. Kemp Conn, District Manager
Bureau of Land Management
PO Box 265669
Las Vegas, NV 89126

Dear Mr. Conn:

This letter is to urge you to support wilderness status for the following areas:

1. Grapevine Mountains WSA
2. Queer Mountain WSA
3. Silver Peak Range WSA

These outstanding areas need to be protected and preserved. All three areas within the California Desert qualify for the designation"wilderness", and Queer Mtn. and Silver Peak are logical extensions of the Death Valley wilderness complex.

I recommend maximum acreage in the Silver Peak area due to the importance of bighorn sheep and wild horses.

Please think of the future when you consider these propositions. We cannot afford to let our land be misused or abused. Wilderness is essential to our way of life.

Thank you.

Sincerely,

Robert Hensley

Comment Letter 57

Tues. Feb. 19, '85

Dear Mr. Conn:

I support wilderness recommendations for:

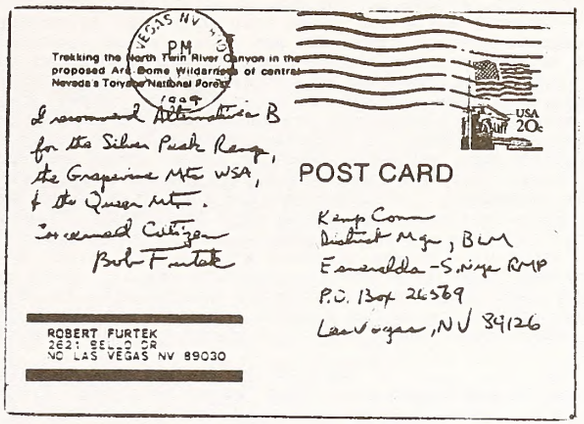
Grapevine Mountains WSA (66,800 acres)
Queer Mountain WSA (81,550 acres)
Silver Peak Range WSA (35,000 acres)

We have too little wilderness areas as it is- the desert is being destroyed by off-road vehicles and development. Let's leave some protected areas for our descendents. Bighorn sheep and wild horses need a lot of land to survive- and once the land is given over to commerce, it is gone forever.

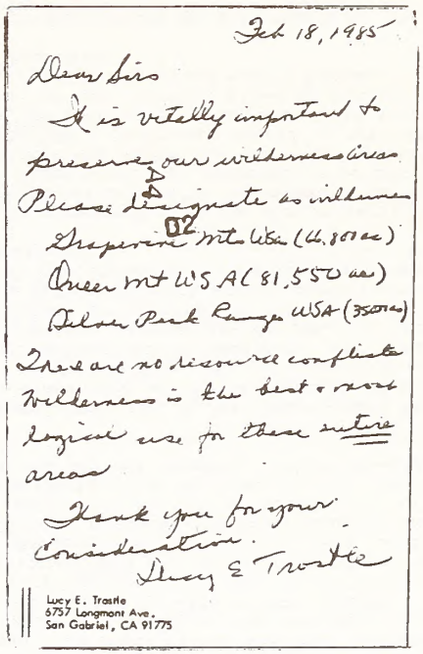
yours,

Diane Wilson

Comment Letter 58


LAS VEGAS NV
PM
Trekking the North Twin River Canyon in the proposed Art Dome Wilderness of central Nevada's Toiyabe National Forest
1989
USA 20c
POST CARD
I recommend Alternative B for the Silver Peak Range, the Grapevine Mts WSA, & the Queen Mt.
Sincerely Citizen
Bob Furtek
ROBERT FURTEK
2621 SELMO DR
NO LAS VEGAS NV 89030
Kemp Conn
District Mgr, BLM
Esmeralda-S. Nye RMP
P.O. Box 26569
Las Vegas, NV 89126

Comment Letter 59


Feb 18, 1985

Dear Sirs

It is vitally important to preserve our wilderness areas. Please designate as wilderness

Grapevine Mts Area (46,800 ac)
02
Queen Mt WSA (81,550 ac)
Silver Peak Range WSA (35,000 ac)

Since are no resource conflicts wilderness is the best + most logical use for these entire areas

Thank you for your consideration.

Lucy E Trastle

Lucy E. Trastle
6757 Longmont Ave.
San Gabriel, CA 91775

C H E R I C I N K O S K E
816 LILLIS
N. LAS VEGAS, NV. 89030
702-642-7238

February 26, 1985

Mr. Kemp Conn, District Manager
Attn: Esmeralda-So. Nye RMP
Bureau of Land Management
P. O. Box 26569
Las Vegas, NV 89126

Dear Mr. Conn:

I realize that it is past the deadline for comments on the Esmeralda-Southern Nye Planning Area RMP DEIS. However, I hope it is not too late for you to consider my comments, especially regarding wilderness areas with the Planning Area. It's an area that is very important to me, but I have been too sick with the flu to get a letter written until now.

Last Spring I was on a backpack in the Silver Peak range. I was extremely impressed with the quality of the wilderness experience there. We saw wild horses, as well as tremendous specimens of petrified wood. It was an extremely wet area, with numerous springs--a rarity in most BLM areas in Nevada. In addition, the feeling of solitude, of having the entire range all to ourselves, was extremely impressive. The beauty of the surrounding hillsides, their brilliant colors, definitely impressed my friends to whom I showed slides following my trip. I feel that the boundaries which should be established for this wilderness area are those outlined in Alternative B. Your Wilderness Technical Report well describes the wilderness attributes of the Silver Peak Range. The entire Piper Canyon basin deserves addition to the wilderness system as proposed in Alternative B. By adding terrain on the east and southeast, Alternative B would protect well-forested slopes and the basin containing the scenic and ecologically important Jeff Davis and Blind Springs. It would also offer protection of the summer habitat critical to the herd of over 100 desert bighorn sheep.

It seems there is only one area classified as highly favorable for metallic minerals, and this is a very small portion of the range. Mining here may significantly damage the wildlife and habitat associated with Blind Spring. Miners so far have seen no need to develop mineral values in the Range. Indeed, it is mere speculation for the most part that such values exist. On the other hand, wilderness enthusiasts have enjoyed the superb wilderness values and wish to see them preserved. We lose nothing by preserving this land as wilderness. If, in the future, it becomes necessary to explore the area for minerals, such minerals will also have been preserved.

Comment Letter 60

I have not had a chance to personally explore the Grapevine Mountains WSA. However, I know that it is contiguous with WSA #4 in Death Valley National Monument. Since the latter has been administratively endorsed as suitable for wilderness by the National Park Service (NPS), it is important to preserve the wilderness integrity of the Grapevine Mountains across the BLM/NPS boundary. If there were mineral development immediately to the north in the Helmet Peak area, there would be negative impacts on the Park Service's wilderness. The Grapevine Mountains are an integral part of the same unit. They are the beginning of the foothills which become higher and higher as the range extends into Death Valley National Monument. At a minimum, the mountainous core of this area, as defined by Alternative B, should be recommended as wilderness. Indeed, I feel the wilderness proposal could be expanded to include the flat bajadas. Although BLM has repeatedly refused to include bajadas because of the possible intrusion of ORVs, this seems merely like a self fulfilling prophecy. Furthermore, it is analogous to stating we should not bother to outlaw killing just because some people are going to kill anyways. I feel most ORVers would respect the law and not trespass into a designated wilderness area.

As far as Queer Mountain, I feel this should be proposed as wilderness, contingent on the designation of the Little Sand Spring unit in California. The California Desert Conservation Area has recommended such designation, and here again it is important to follow natural boundaries, not political ones. Again I would prefer Alternative B's boundaries for this area. As I mention above, I do not accept the argument that areas should not be designated as wilderness because of the possibility of ORV intrusion.

60-1 Finally, I am concerned that the BLM Preferred Alternative is expected to produce a mere 1% improvement in ecological condition. Since goals are supposed to be something to aim for, recognizing that one might fall short of reaching them, I feel that the proposed improvement should be much greater. Indeed, considering the extreme uncertainties that surround achieving the goal, as well as the inherent flaws of statistical projection, a 1% proposed improvement could easily become a decrease in the quality of the range.

Thank you for considering my unfortunately late comments.

Sincerely,

Cheri Cinkoske

Cheri Cinkoske

Comment Letter 61

February 24, 1985

Marlee Ostrow
365 N. Spaulding Ave. #1
Los Angeles, CA. 90036

Mr. Kemp Conn, District Manager
Bureau of Land Management
P.O. Box 265669
Las Vegas, NV 89126

Dear Mr. Conn;

I am writing to you in regards to the Bureau of Land Management recommendations for the future of the land surrounding Death Valley National Monument. I sincerely hope the areas in question (Grapevine Mountains WSA, Queer Mountain WSA and Silver Peak Range WSA) are going to be recommended in their entirety and totality as wilderness areas. Due to their lack of profitable natural resources such as minerals and timber, it seems only logical that they be left alone to nurture the living resources they contain such as bighorn sheep (a Critical summer habitat in the Silver Peak Range!) and wild horses.

It appears to me that the Grapevine and Queer Mountain WSA's should be recommended as wilderness areas if only to act as buffer land for Death Valley National Monument. The fact that the boundaries of these areas may be difficult to detect from the ground is all the more reason to recommend the total areas for wilderness designation. Maybe that way at least the core of each area can remain pristine, much in the same manner as a coconut husk protecting the sweet meat inside.

I encourage you to recommend all 66,800 acres of Grapevine Mountains WSA, all 81,550 acres of Queer Mountain WSA, and all 35,000 acres of Silver Peak Range WSA for wilderness designation. Lets leave some awesome desolate wilderness for the future and our own peace of mind.

Sincerely,
Marlee Ostrow
Marlee Ostrow

Comment Letter 62

March 16 1985

Mr Kemp Conn District Manager
Bureau of Land Management
Box 265669
Las Vegas Nv

Dear Mr. Conn

I am writing in hopes this letter is not too late to encourage wilderness designation for 3 areas: Grapevine Mountains WSA
Queer Mountain WSA
Silver Peak Range WSA.

These areas qualify as wilderness. The first two are logical extensions of Death Valley wilderness. Resource conflicts are not significant for all areas. The third area is important bighorn sheep habitat, and for this reason I encourage you to designate the full area available, not just a portion. Preserving these wilderness areas is important to our long-term future. I hope you will not let short term priorities outweigh these long-term needs.

Sincerely
Ann Pitchford
942 Dalton Dr.
Las Vegas NV 89119

3/11/85

Dear Mr. Conn

I support wilderness designations for

Grapevine Mtns.
Deer Mtn.
Silver Peak Range

I believe all of the above are qualified for wilderness designation.

I feel that the Grapevine and Deer Mtns are extensions of the Death Valley wilderness complex and should be protected.

None of the 3 areas have resource conflicts and I feel that wilderness is the best use for them.

Lastly, since Silver Peak Range is home to large herds of bighorn sheep & wild horses, the maximum acreage should be recommended.

Sincerely,
Susanne Madda

Governor Consistency Review Letter

STATE OF NEVADA

RICHARD H. BRYAN
Governor

LINDA A. RYAN
Director

STATE OFFICE OF COMMUNITY SERVICES
Capitol Complex
Carson City, Nevada 89710
(702) 885-4420

July 25, 1985

Edward F. Spang
State Director
Bureau of Land Management
P.O. Box 12000
Reno, Nevada 89520

Re: SAI NV #85300025 Project: Governor's Consistency Review, Esmeralda/ Southern Nye - RMP/FEIS

Dear Mr. Spang:

Thank you for providing the above referenced planning document for our review and comment. As you know, in February of this year, the Governor's office, in cooperation with several executive branch State agencies, presented a consensus position to the BLM on the Draft Esmeralda/Southern Nye Resource Management Plan. Our position was limited to the wilderness proposals developed for consideration by the Bureau.

Unfortunately, the Bureau is still in disagreement with the State over the Silver Peak Range Wilderness Study Area (NV-060-338). We must again reiterate our position that this area be dropped from further wilderness consideration. As stated in our consensus position, this area has significant mineral resource potential and we believe the Bureau has not fully considered all the available evidence in this matter. We also note that in Chapter 3 of the FEIS, the Bureau has included several revisions to the minerals section for the Silver Peak WSA. These changes would seem to confirm our position on mineral potentials in the area.

As you are aware, the State has also questioned the potential for management conflicts between wilderness and wild horses. The Silver Peak WSA is an important bighorn sheep habitat area. We are concerned that wilderness designation would affect wild horse

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management, which in turn would reduce bighorn sheep habitat in the area. Finally, we must remind the Bureau that Esmeralda County opposed designation of this wilderness area.

In reference to the Silver Peak WSA, it is quite clear that the Bureau's position is inconsistant with the policies and plans of the State of Nevada and the affected local government. We hope you will reconsider your position.

Sincerely,

Linda A. Ryan
Director

LAR/11

RESPONSES TO THE COMMENTS ON THE DRAFT RMP/EIS

1-1 The objective of the preferred alternative for wilderness was to recommend only those areas for wilderness where the values of designation outweigh the values and uses which would be foregone. Both the Grapevine Mountains and Queer Mountain WSAs contain only moderate wilderness values with less than outstanding opportunities for primitive recreation. These values do not outweigh the WSAs moderate potential for minerals and geothermal resources. In addition, areas recommended for wilderness designation must be capable of being managed for wilderness over the long term. Both of these WSAs have potential ORV manageability problems and Queer Mountain has potential manageability problems associated with mining claims. Management for wilderness over the long term would be difficult and expensive. Although designation of these WSAs would undoubtedly enhance the contiguous Park Service wilderness proposals, designation of the BLM areas are not crucial to maintenance of wilderness values in the Park.

1-2 The Proposed Plan identified a pool of land from which disposal may take place. In addition all land disposal actions are discretionary and require a land report/environmental assessment. This process would identify critical sheep habitat and water sources and provide for mitigation and/or avoidance of possible adverse impacts to the habitat.

1-3 The Amargosa Desert area, in which 26,880 acres are proposed for disposal, has been identified by the Nevada State Water Engineer as a designated ground water basin. This means that ground water conditions warrant special administrative attention, and each application is evaluated on its own merit. Currently, the State Water Engineer is approving no new applications for irrigation in Hydrographic Area #230, the Amargosa Desert. The State Water Engineer has denied over 50 applications for irrigation water; future applications will have little likelihood of being approved. Applications for other uses will be reviewed on a case-by-case basis by the Office of the State Water Engineer. For these reasons effects of land disposal on water resources will be analyzed on a case-by-case basis through the land report/environmental analysis process and were not analyzed in the draft RMP/EIS.

4-1 The "Proposed Plan Management Guidance" section of Chapter 2 states that "Designated corridors will be three miles wide and planning corridors will be five miles wide except where topographic constraints exist." This guidance applies to all alternatives including the Preferred and is found on page 14.

5-1 The BLM will be responsible for monitoring wild horse habitats and populations and will utilize all available data to make management decisions. Available data could come from government agencies, special interest groups and/or BLM studies. One assumption made in this document was that funding would be available.

However, concerns about sufficient funding can best be answered by looking at the prioritization of each allotment, i.e., the selective management categorization (MIC) concept. Allotments where resource conflicts exist and where opportunities for improvements exist have been rated in the "I" category.

The Bureau's monitoring efforts will be more intensive within the "I" allotments, and less intensive studies will be conducted in "M" and "C" catagories respectively (see rationale for MIC catagorization in the draft RMP/EIS on page 162).

Monitoring studies will be read by BLM district and resource area specialists and will be read once a year.

7-1 Please see responses 1-1 through 1-3.

9-1 This sentence has been expanded to include "There is a constant attrition of these resources as surface disturbing activities relating to mining, ranching, farming and the like take their toll along with natural processes, such as erosion." Any standard textbook in archaeology will make similar remarks. In addition, the aforementioned sentence was not intended to single out any specific cause for the destruction of cultural resources. A recent study contracted by the BLM California Desert District gives a detailed study of various conditions which have led to impacts to cultural resources in the desert. This study was completed in 1980.

9-2 Public Law 94-579, the Federal Land Policy and Management Act of 1976, Section 603, mandates that "within fifteen years after the date of approval of this Act, the Secretary shall review those roadless areas of five thousand acres or more and roadless islands of the public lands, identified during the inventory required by section 201(a) of this Act as having wilderness characteristics described in the Wilderness Act of September 3, 1964 (78 Stat. 890; 16 U.S.C. 1131 et seq.) and shall from time to time report to the President his recommendation as to the suitability or nonsuitability of each such area or island for preservation as wilderness...."

The Esmeralda-So. Nye RMP/EIS is the vehicle being used to fullfill the requirements of this law. The areas involved in this study meet the inventory criteria and were, therefore, carried through the planning process. Areas identified as suitable, if any, are only recommendations not decisions. Only Congress can designate a wilderness area.

9-3 The BLM Wilderness Study Policy (1982) outlines the different steps which must be completed in the evaluation of the suitability of a wilderness study area. One of these steps is to evaluate each WSA in respect to two criteria and six quality standards. One of the criteria, Evalaution of Wilderness Values, has a component which analyzes how the addition of any one WSA would affect the diversity of the National Wilderness Preservation system. During this step team members evaluated three factors.

One of these factors evaluates balancing the geographic distribution of wilderness areas. Since Nevada only has one designated wilderness area which covers less than .09 percent of the state (less than any other Western State), it is reasonable and appropriate to conclude that the State of Nevada is underrepresented.

9-4 No designation of wilderness areas has been made. A mineral survey is now being conducted by the U.S. Geological Survey and the Bureau of Mines for those areas recommended as suitable. Information contained in the report will be analyzed prior to the Secretary's recommendation to the President. The

minerals information used in the Draft EIS was the best information available to the BLM at the time the Draft document was published.

9-5 No further hearing or meetings are planned. Please see response 9-4 with respect to mineral inventories.

10-1 Management prescriptions for the Preferred Alternative include "Intensively manage six Improve category allotments and provide three Maintain category allotments with additional range improvements." A significant component of intensive management is the development of waters as outlined in Table 2-5. In addition, Appendix K outlines specific water development projects by allotment. The "Water Resources" section of Chapter 4 of the draft RMP/EIS identifies impacts to water re- sources by alternative.

10-2 Correction has been made (see Errata).

11-1 The season of use which appears in Table 3-8, p. 58 is in error. The final has been revised to show the correct season of 9-15 to 12-1; 3-1 to 6-30 (see Errata).

11-2 The proper number of livestock for this period will be determined after evaluating several years of monitoring data which will be initiated on the White Wolf allotment after this plan is finalized. An increase in your preference at this time would be contrary to the proposed plan as outlined in the "Proposed Plan Management Guidance" section, "Livestock Use Adjustment", subsection, page 17. The nature of these monitoring studies appears under the "Monitoring Program" subsection on page 15.

12-1 Summary Table One is a summation of both Planning Areas A and B.

12-2 Summary Table Two is a summation of both Planning Area A and B.

12-3 Correction has been made (see Errata).

12-4 Current funding levels were used in the analysis of the Preferred Alternative. Under these spending levels, the management prescriptions identified were not able to fully meet all the objectives for the Preferred Alternative. However, there are a total of 6,660 acres of riparian vegetation within the planning area. Implementation of the Proposed Plan would benefit 5,503 acres or 83 percent of the riparian areas. The BLM feels this is significant and a dramatic improvement over present conditions.

12-5 Proposed utility corridors would adversely affect the habitats of mule deer but not significantly as identified in the draft RMP/EIS (page 92). These corridors already have existing rights- of-way, are in winter ranges and only traverse the edges of the mule deer ranges. For these reasons no mitigation was proposed.

12-6 The scale of the map used in the RMP to delineate areas of proposed land disposal was not of large enough scale to permit the delineation of Amargosa speckled dace and Amargosa toad habitat along the Amargosa River. All land disposal actions are discretionary and require a land report/environmental assessment. This process would identify any sensitive, threatened or endangered species habitat and provide for mitigation and/or avoidance of possible adverse impacts to the habitat.

17-1 Manageability was not a deciding factor in the development of the Preferred Alternative. The area recommended nonsuitable for wilderness designation (17,234 acres) has either a moderate or high potential for metallic minerals and geothermal resources. In addition deletion of this area avoids potential conflicts with mining claims along the periphery of the WSA.

17-2 Some members of the ranching and mining sectors interpret wilderness as a "lock-up" against any uses except occasional solitary enjoyment by those whose livelihood does not depend on the economic use of the natural resources found on the areas proposed for wilderness designation. In the planning area, as in many parts of the west, there is some resentment of the suggestion that any publicly owned open spaces should be encumbered by regulations against particular uses. Unregulated access to public lands is often jealously guarded as a birthright and wilderness, perhaps more than any other Bureau program, threatens that perception.

17-3 The "Wilderness" section of the Environmental Consequences Chapter of the draft RMP/EIS is divided into two parts. The first part describes the effects of management prescriptions and the second part describes impacts resulting from the affected activities. These sections are further broken down into suitable and nonsuitable areas. The "Impacts Resulting from the Affected Activities" section has specific discussions of what wilderness values would be lost.

18-1 Many assumptions were made pertaining to baseline information and analysis procedures. However, these assumptions remained constant and were applied to the analysis of all alternatives. Therefore, impacts identified for different alternatives, although not absolute, can be compared. Management objectives and prescriptions are identified in the Proposed Resource Management Plan. If monitoring indicates that resource objectives are not being met (e.g., improvement of ecological condition) management prescriptions identified will be modified.

18-2 Even with the implementation of monitoring, AMPs and HMPs as identified in the Proposed Plan, there will be some adverse impacts to riparian vegetation. These riparian areas are small compared to the total allotment or herd management area in which they occur. Grazing animals will congregate around these riparian areas especially in the summer because of the general lack of water over the entire range. This use pattern is not expected to change with any small reduction of grazing animals. However, to reduce livestock and/or horses and burros to a level which would significantly mitigate grazing pressure on these areas (alternative B and C levels) would result in the significant adverse economic and social impacts identified under alternatives B and C. The complete fencing of these areas collectively is also economically unfeasible under present funding projections. It is the objective of the Proposed Plan to protect as many of these areas within funding constraints. Realizing that some adverse impacts will still occur under the

Proposed Plan, we feel these impacts are not significant as 83 percent of the riparain areas will be maintained or improved.

19-1 Only in the long term (5-20 years) will major increases in wildlife be attained. This will be accomplished through implementation of activity plans such as habitat management plans and allotment management plans. Monitoring will identify those areas where conflicts exist and management actions will be taken to alleviate these conflicts. The implementation of activity plans will provide better utilization of livestock forage through water and fence development. Conflicts of livestock and wild horses with bighorn sheep and mule deer can be resolved through implementation of habitat management plans.

Alternative B does emphasize, but not maximize wildlife numbers. Alternative B maximizes the wild horse and burro resource and reduces the livestock use 30 percent from current use. Alternative C maximizes the wildlife resource by the removal of all livestock and the removal of all wild horses and/or burros from bighorn sheep and mule deer ranges.

No specific details on how wildlife changes will be accomplished, other than water development and fencing projects, were outlined in any alternative because of the complexity of the document, the number of allotments, the number of wild horse or burro areas, the number of big game wildlife areas, and the lack of site specific information. However, based on the information that we had available we were able to make general predictions. Example: Alternative C; page 142, right column, 6th paragraph ..."the removal of all livestock and the removal of wild horses and/or burros from bighorn sheep ranges. This would remove the competition with bighorn for water, space and forage. In most ranges reasonable numbers would not be achieved because of the lack of necessary funds required for water development. With water development and reintroduction, the Silver Peak Range herd would increase by 542 bighorn...."

19-2 The following information related to threatened and endangered species (T and E species) is present in the RMP/EIS.

Ash Meadows provides habitat for the greatest concentration of proposed and/or listed threatened and endangered plant and animal species in Nevada.

Twenty endemic and two rare animal species and seven endemic plant species are found in the Ash Meadows area. Of the 20 endemic animals species, four are federally listed as endangered, one is proposed for endangered listing and 14 are candidates for future listing as either threatened or endangered. All seven endemic plant species are proposed for federal endangered listing.

The 1980 revised Ash Meadows Habitat Management Plan (HMP) was prepared for the purpose of protecting and enhancing the habitats of endemic and rare animals and plants present in Ash

Meadows. Wild horses are currently identified for removal from Ash Meadows (Fiscal Year 85) to protect these endemic species and their habitat from trampling and grazing. The Proposed Plan states that the Ash Meadows ephemeral allotment would be closed to protect proposed endangered plant species and endangered fish habitat.

In draft Chapter 4 impacts to T and E species are analyzed. In draft Chapter 2, the "Management Guidance Common to all Alternatives" section outlines management guidance for T and E plant or animal species.

Through habitat management plans, herd management plans, allotment management plans, and other management actions including monitoring, livestock conflicts in crucial wildlife areas would be resolved.

19-3 The No Grazing Alternative is included as a matter of policy in as much as it provides for a broader range of alternatives and affords the manager another reference point on which to base decisions. During the alternative development stage, a range of alternatives was developed for each issue. Once this was completed the RMP/EIS team combined all issues into four alternatives which they felt provided a logical progression of management prescriptions and helped to simplify the analysis. Alternative A proposes a maximum level of livestock grazing while recommending a minimum acreage for wilderness designation. Alternative B reduced livestock grazing and increased acreage recommended for wilderness designation. Alternative C then eliminated livestock grazing while increase the area recommended for wilderness designation to a maximum. This was a logical sequence of events for both issues and never meant to tie no grazing with maximum wilderness.

These alternatives are then analyzed and a Preferred Alternative is selected. The Preferred Alternative and subsequent Proposd Plan may be any one of the proposed alternatives, but in most cases, as in this RMP, it integrates portions of all alternatives analyzed. It would have been an overwhelming task to analyze every possible array of management prescriptions. The RMP never meant to tie no grazing with maximum wilderness.

19-4 Although wildlife habitat was not identified as an issue, it is a critical part of the rangeland management issue analyzed in the draft RMP/EIS. Because of the direct interaction between livestock, wildlife, wild horses and burros, they were consolidated into one issue. This decision does not diminish the significance of wildife, or, for that matter, livestock, wild horses and burros, but was made in an effort to simplify an already complex process.

19-5 Road rights-of-way are discretionary actions. They require a land report/environmental analysis. Through the land report/ environmental analysis threatened, endangered or sensitive species habitat, riparian areas, critical wildlife areas, flood plains, and wetlands must be considered. Alternatives and mitigation, if necessary, will be considered for the protection of these important habitats. Not all riparian areas will be protected in this RMP. Funding constraints and other priorities make it impossible to protect every riparian area.

19-6 It is assumed you mean page 53 not 33. The Bureau of Land Management has the responsibility for managing the habitats of wildlife. Nevada Department of Wildife has the responsibility of managing the wildife in Nevada. We accept Nevada Department of Wildlife's reasonable numbers and manage the habitat for those goals. The only time that the BLM makes recommendations to change state reasonable numbers is when habitat conditions are degraded by wildlife.

19-7 See response 12-6.

19-8 Actions of the Preferred Alternative provide for the protection of riparian systems within the restraint of reasonable funding projections. Though all riparian systems outside of Ash Meadows, especially those associated with individual spring sources, cannot be protected, the Preferred Alternative includes actions which target riparian habitats which are or may be experiencing over use. Due to the implementation of the Proposed Plan, approximately 5,503 acres, 83 percent of the total 6,660 acres of riparian habitat in the RMP area, would benefit from management prescriptions and/or facilities identified in the proposed plan. The remaining riparian habitat will be enhanced as funding becomes available.

22-1 One assumption made in the RMP/EIS was that funding would be available. However, concerns about sufficient funding can best be answered by looking at the prioritization of each allotment, i.e., the selective management categorication (i.e. MIC) concept. Allotments where resource conflicts exist and where opportunities for improvements exist have been classified in the "I" category. The Bureau's monitoring efforts will be most intensive within the "I" allotments while less intensive studies will be conducted in "M" and "C" category allotments (see rationale for selective management on page 162 in the draft RMP/EIS.) Also see response 36-5.

Available baseline data and studies are discussed in the "Vegetation", "Wildlife" and "Wild Horse and Burro" sections of Chapter 3, "Affected Environment of the draft RMP/EIS." This information can be reviewed in the Las Vegas District Office.

22-2 The No Action Alternative is the Preferred Alternative in respect to wilderness for the Grapevine Mountains WSA.

22-3 The BLM considers wilderness designation compatible with multiple use management. Wilderness designation will not preclude management of wild horses. The Silver Peak Range is one of our priority areas with an HMP already completed. In addition, the Proposed Plan identified the Silver Peak Area as first priority for AMP and HMAP development and implementation. These documents will be well coordinated and will identify specific management actions to improve habitat.

22-4 Development of an HMAP for the Silver Peak Range, Stonewall and Cone Mountain will address wild horse/wildlife conflicts. If wild horses are determined to be responsible for the degredation of the range, management actions will be initiated to remedy the situation. The RMP did express concern for a lack of waters in the areas you mentioned and recommends that the wildlife and wild horse program fund water developments. Thus, in some cases, funding from the wild horse program will also improve habitat for wildlife.

It is also important to realize that wild horses are also restricted to certain locations within the planning area and will be managed within the existing herd management areas.

22-5 Emigrant Peak Allotment has been identified as closed to livestock grazing in the Proposed Plan. This is consistent with the approved HMP.

22-6 Under present management approximately 70 percent of the RMP area is grazed yearlong. If the Proposed Plan is implemented 61 percent of the RMP area that was previously grazed yearlong will be managed intensively as Improve category (I) allotments. These "I" allotments include Magruder Mt., Montezuma, Silver Peak and Mt. Stirling. Allotment management plans (AMPs) would be developed for these four allotments through consultation and coordination with the permittees and other interest groups at the onset of plan implementation. The development and implementation of these AMPs would improve vegetative condition and livestock distribution.

Under present management livestock and wild horses overgraze the riparian habitat associated with springs throughout the RMP area, especially in allotments and use areas grazed yearlong. If the Proposed Plan is implemented 61 percent of the RMP area that was previously grazed yearlong would be managed intensively as Improve category allotments. This change in management would cause the following changes in riparian habitat. Some 75 acres of streambank riparian habitat will improve or remain the same due to the construction of protective fencing and periodic no grazing periods on about 50 acres. An estimated 540 acres of meadow riparian habitat would improve in condition, and 5,470 acres would be maintained in their present condition. About 35 acres of spring riparian would improve, and 25 acres would remain protected.

22-7 See response 1-3.

22-8 The land ownership patterns in the areas of Goldpoint and Rhyolite were examined during the planning process. As a result, several alternatives were developed and analyzed in the RMP/EIS. The Proposed Plan identifies a pool of land from which disposal may take place if a need arises in these areas. This would lead to a blocked-ownership pattern and enhance management of the area.

27-1 The RMP/EIS was written utilizing the ecological condition class ratings so that impacts of each alternative could be analyzed with respect to vegetation condition. Once the overall impact to the range resource was determined each specialist analyzed how that impact would affect the wildlife, wild horse and burro, or livestock resource. This determination was made based on the potential vegetation as it pertained to soil type and desireable forage conditions for each herbivore. For range sites described in this planning area, it is expected that forage species preferred by livestock, wild horses and burros, elk and bighorn sheep would increase in the plant communities as each seral stage progressed to its potential. However, due to the lack of representation of good deer forage species in most of the range site descriptions in the planning area a change in seral stage is expected to have little effect on mule deer forage conditions.

Changes in the amount of available forage for each herbivore due to long term changes in seral stage were analyzed using the scheme described in Appendix G, p. 177 of the draft RMP/EIS. These impacts were addressed in Chapter 4 ot the draft RMP/EIS with a general adverse or positive statement if the change in AUMs was small or as a projected change in the number of animals if the change was measurable as on p. 118 paragraph 3 of the draft RMP/EIS. A complete table of forage ratings for each seral stage was not provided because these ratings have not been developed. The "Wildlife" section of Chapter 4 of the draft RMP/EIS describes impacts relating to changes based on alternative management actions, and does not relate specifically to condition rating in most cases.

27-2 As was pointed out in the RMP/EIS, areas of competition exist. Water was identified as the most crucial. In an attempt to alleviate some of the competition, waters were proposed for fencing and guzzlers are to be installed specifically for sheep. Using monitoring to identify specific problems and implementing management actions as described in the document, opportunity for bighorn sheep population and habitat expansion without a total wild horse and burro removal or significant reduction in livestock is a very real possibility.

27-3 The RMP/EIS recognized that bighorn sheep are state listed as "sensitive species" and that they currently inhabit specific areas. However, wild horse and burro range as well as livestock grazing are also recognized users of the public lands. As analyzed in the document, competition does exist between wildlife and other uses in some areas. Management actions designed to alleviate these conflicts have been proposed under the Proposed Plan. In addition, studies will be established to further monitor conflicts. Objectives of the Proposed Plan specifically state that we will continue to strive toward reasonable numbers of bighorn sheep in existing ranges and that reintroduction of bighorn sheep into historic and potential ranges will occur as funding permits.

27-4 See response 22-5

27-5 The Specter Range, a potential bighorn habitat, is not in a BLM grazing allotment. The Specter Range was not included in Table 3-6 on page 53 of the draft RMP because it was of such low priority for introduction and project development that no reasonable numbers were identified for the range. Based on this information, the introduction of bighorn sheep into the Specter Range was not within the life of this plan.

27-6 There are many speculative reasons why there are no bighorn sheep present in the historical areas adjacent to presently occupied portions of the Monte Cristo, Lone Mountain, and Silver Peak ranges. They include: poaching and unregulated hunting following the immigration of white men to Nevada; overgrazing by domestic sheep and cattle; introduction of new diseases from the domestic sheep to the bighorn; and, intensive mining ac-

tivities between 1859 and 1930 which often eliminated bighorn use of many historic bighorn waters. The intention of this RMP is not to dwell on speculative reasons why historical ranges are not occupied by bighorn sheep but to reintroduce bighorn sheep into historical ranges and work towards NDOW reasonable numbers for each range.

30-1 The Proposed Plan, is for the most part, in agreement with your concerns. This plan proposes the closure of the Ash Meadows allotment to protect 60 acres of rare plant critical habitat and 18 acres of aquatic habitat from domestic livestock grazing. Also 680 acres of the critical habitat of rare plants will be protected from domestic livestock grazing in the Carson Slough and Grapevine-Rock Valley allotments. This will be accomplished through a Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS) when and if an application for use on either of these allotments is made. The USFWS will then make a determination whether authorization can be made without detriment to the rare plants. The impact domestic livestock grazing might have on the estimated 87 acres of aquatic habitat within these two allotments would also be considered by the USFWS during this consultation.

Further, the removal of all the feral horses in the Ash Meadows area is scheduled to occur in 1985. This removal program is fourth on the Bureau's Nevada removal priority list for 1985.

30-2 The Ash Meadows Area, specifically BLM administrated lands, is considered to be adequately managed for proposed and/or listed threatened and/or endangered species. A Habitat Management Plan has been partially implemented and will continue to be implemented and modified to include new data pertaining to threatened or endangered species. In addition, the U.S. Fish and Wildlife Service is in the process of creating a wildlife refuge in Ash Meadows. Implementation of the U.S. Fish and Wildlife Service (USFWS) Land Protection Plan for Ash Meadows would protect these species.Also, the Big Dune area is considered to be adequately managed for the Giuliani's Dune Scarab Beetle. A Conservation Agreement (CA) has been initiated between USFWS and the BLM for the purpose of aiding in the conservation of the dune beetle. One of the actions of the CA will be the preparation of an HMP.

30-3 Please refer to the response to comment 30-1 related to the Carson Slough allotment. Actions of the Proposed Plan provide for the protection of riparian systems within the restraint of reasonable funding projections. Though all riparian systems outside of Ash Meadows, especially those associated with individual spring sources cannot be protected, the Proposed Plan includes actions which target riparian habitat which are or may be experiencing over use. Due to the implementation of the Proposed Plan, approximately 5,503 acres, 83 percent of the total 6,660 acres of riparian habitat in the planning area, would benefit from management

prescriptions and/or facilities identified in the proposed plan. The remaining riparian habitat will be enhanced as funding becomes available.

We have no knowledge of any officially recognized endangered species in the planning area outside of Ash Meadows.

30-4 See response 12-6.

30-5 Please refer to response 30-1 regarding grazing in Ash Meadows.

At this time, the Bureau does not have the resources available to search for potential habitats of sensitive plant species. However, your work through the Nevada Natural Heritage Program will be appreciated and used to update the data base for this planning area.

34-1 See response 30-2. As pointed out on page 15, five acres of critical habitat in the Big Dune Area are closed to ORVs. In addition, 126 acres of habitat are closed to competitive events. This management action is in accordance with a Conservation Agreement between BLM and U.S. Fish and Wildlife Service addressing the Giuliani's Dune Scarab Beetle.

The designation of potential ACEC areas were not analyzed in the document since current management options now available to the BLM are adequate for the protection of any special resources found in the RMP area.

36-1 The statement you cite in paragraph two of your letter of February 14, 1985 which indicates no comments were received from "stakeholder groups which are advocates of wilderness" is in error. Your participation was as you indicated in your letter of February 14. Your concerns as expressed in those letters were considered, along with other public input, in the development of the wilderness recommendations. An errata sheet deletes the cited paragraph on page 76 of the draft document.

36-2 See responses 30-2 and 34-1.

36-3 Guidelines identified in Chapter 2 consist of current management practices expected to continue, standard operating procedures, implementation guidelines and regulations and policies pertaining to public land management. These guidelines were in effect prior to the development of the RMP and pertain to both issue and nonissue resources. Issue selection for the RMP was not based on the guidelines. As with all planning efforts and environmental studies, a point in time must be selected at which all data and analysis processes will remain constant. The BLM has assumed for analysis purposes that the guidelines identified in Chapter 2 would remain constant. Guidelines are based on policy and regulation and may change in the future. Any such change would result in an evaluation of management decisions for consistancy with new guidelines and may result in a plan amendment, if necessary.

36-4 "Special stipulations" in this case means those stipulations or mitigations which would be in addition to the standard lease terms or stipulations attached to all oil and gas or geothermal leases issued by the BLM.

36-5 Some details regarding existing monitoring studies are given on pages 44-46 of the draft RMP/EIS. Specifically, seven key areas in the Monte Cristo allotment are monitored with 14 utilization plots (key forage species method), 12 photo trend plots and 10 quadrat frequency trend plots. Utilization data has been collected for 1981, 1982, and 1983. Trend studies are to be reread at a future date; therefore, the information to judge trend from these studies is not available at this time. The apparent trend data collected for the EIS was used for the trend analysis in the EIS.

Eight key areas in the Magruder Mtn. allotment have been monitored for utilization for some part of the period from 1973 through 1981. Data from 7 photo trend plots had been collected for 4 years within this same time period. This cover trend data was used to modify the apparent trend data collected for the EIS analysis.

The utilization data from both allotments were used to identify management problems which appear in Appendix C, "Allotment Resource Conflicts and Opportunities" of the draft RMP/EIS.

All the existing data referred to is summarized in the Esmeralda-So. Nye MSA document which is available for review in the Las Vegas District Office.

36-6 Riparian areas would be maintained or improved by the implementation of several management prescriptions listed on pages 11 and 12. Those include:

1. Intensive management of six "Improve" category allotments. This would include development of allotment management plans and the construction and implementation of associated range development projects.

2. Development and implementation of herd management area plans (HMAPs) in wild horse and burro herd use areas and associated projects.

3. Development and implementation of habitat management plans (HMPs) and associated projects.

4. Modification of the Ash Meadows HMP using new data pertaining to sensitive, threatened or endangered species.

5. Implementation of special management treatments and/or facilities along 4.8 miles of streams to improve aquatic and riparian habitat condition.

36-7 The objectives of Alternative A call for some wilderness, "recommending only those areas with the highest wilderness values as suitable..." The area of highest wilderness values was also the only area to meet the objectives of the draft Preferred Alternative, "those wilderness study areas where the values of wilderness designation are capable of balancing the other resource uses..."

36-8 Please see response 12-4.

36-9 Please see response 22-6.

36-10 Please see responses 12-5 and 12-6. Again all land disposal actions are discretionary and require a land report/ environmental assessment. This process would identify cultural resource sites found and provide for mitigation and/or avoidance of possible adverse impacts.

36-11 As a result of the 1973 Federal court suit, the Bureau has been directed to write an EIS analyzing the potential impacts of alternative grazing programs. In addition, a schedule was established for the completion of this court-ordered mandate. This EIS requirement was integrated with the RMP and satisfies this requirement. To meet the established schedule the RMP process for the Esmeralda-So. Nye Planning Area must be completed in fiscal year 86. Therefore, the RMP was initiated in 1983 and used the best available information as required by the CEQ regulations. BLM policy requires that monitoring be initiated to provide reliable data on which to base range management decisions. This information along with that used in the RMP will be used to make specific range management decisions.

The data base utilized in the RMP is useful in identifying a starting point from which future realistic objectives can be selected that are within the potential of those sites. However, range condition as discussed in the Esmeralda-So. Nye RMP was not intended nor can it be used to determine grazing capacity. While ecological condition is derived from the relative percentage of the species composition by weight in a community (annual production of each specific plant species) it does not consider dietary preferences of the various consuming animals; period of consumption, forage requirements of the animals or the amount and timing of the animals or the amount and timing of annual precipitation. All of these variables must be considered and factored in to convert vegetation production of various species to grazing capacities.

50-1 Please see response 19-3.

50-2 During the development of the RMP/EIS the best information available was used as the baseline data in the analysis. Although not complete, the Bureau felt it was adequate for the analysis. Management prescriptions identified in the Proposed Plan will continue existing rangeland monitoring studies and establish new studies as recommended by the 1981 Nevada Range Monitoring Procedures. The monitoring studies will determine if management objectives are being reached and what adjustments in livestock use, wild horse and burro numbers and wildlife reasonable numbers are necessary.

50-3 Wilderness study policy and planning criteria state that, "The BLM will recommend for wilderness designation only those areas for which it has been determined, through the Bureau's multiple resource planning process and public involvement, that wilderness is the most appropriate use of the land and its resources." In addition, it further states that

wilderness values must be sufficient to outweigh other resource value foregone due to designation. In the Proposed Plan none of the WSAs were determined to have wilderness values significantly high enough to outweigh mineral values.

Through resource management planning the highest and best use for public land is identified. There is no requirement to balance one use against another (e.g., one acre wilderness for every one acre of utility corridor or land disposal). Planning tries to meet the demands placed on public land while avoiding or reducing conflict with other uses or resources to a minimum.

50-4 Pigeon Spring and Resting Springs WSAs were not studied along with the larger California Desert Conservation Area (CDCA) units they are contiguous to because of conflicting time frames. California completed the CDCA wilderness inventory in 1979. The wilderness study phase was completed in September, 1980 with publication of the final EIS and wilderness suitability recommendations. Nevada did not finish the inventory stage which designated these areas as WSAs until two months later in November, 1980.

50-5 Please see response 50-4.

50-6 The criterion used to select the Preferred Alternative for the Grapevine Mountains WSA was the presence of a moderate potential for metallic minerals in approximately one-third of the mountainous portion of the WSA. Wilderness values were not high enough to outweigh mineral potential.

50-7 Mineral potential was developed using the Geology-Energy-Mineral report (GEM) developed for the area in addition to a geochemical report completed by the Nevada Bureau of Mines and professional judgement.

50-8 No claims have been validated.

50-9 The criterion used to select the Preferred Alternative for the Queer Mountain WSA was the presence of a moderate potential for metallic minerals in the northwest, northeast and southeast portions of the WSA. Wilderness values were not high enough to ourweigh mineral potential.

50-10 Wilderness values found within the WSA are not high enough to outweigh the moderate and high potential for metallic minerals found within the WSA.

50-11 Wilderness designation is beneficial to bighorn sheep but not necessary for their existence. Wilderness designation makes it easier to protect bighorn habitat from degradation, especially from mining development which creates new access into bighorn habitat and may eliminate the bighorn's use of permanent bighorn waters. This factor was emphasized in the Silver Peak Range WSA because of current bighorn populations.

51-1 This sentence was in error and has been removed. Please see errata.

51-2 Please see response 9-1.

51-3 Please see response 9-3.

51-4 Data reported for mineral production and employment and income provided by the mining in-

dustry in Esmeralda County were consistant with the latest data for all industries available to us at the time the analysis was developed. The base year for analysis was 1981. It was necessary to maintain as much consistancy as possible in the data reported for all industries, relative to the base year, for the purposes of comparison. Wide swings in production activity, income, and employment from year to year, are characteristic of the mining industry in Nevada with its dependence upon market demands that may be regional, national or international. A restrained approach to analysis precludes the arbitrary selection of a particular year for one industry in favor of a data base that provides for an integrated analysis of the structure of the economy.

51-5 The major problem underlying economic evaluation of minerals is the great uncertainty regarding the existance of mineral deposits in sufficient quantity and quality to be commercially feasible. At present, mineral potential is undetermined. In addition, long-range mineral resource evaluation and market demand estimates are, at best, speculative.

Because there is presently no mining activity within the WSA the formal designation of this area would have no significant impact upon the area economy. However, the possibility of foregoing an opportunity for future mineral development has been recognized and any areas recommended for designation as wilderness will have intensive mineral inventories conducted by U.S. Bureau of Mines/U.S. Geological Survey.

51-6 Presence or absence of mining claims was never a factor in the determination of mineral potential in this document. This statement dealt with the manageability of the area as wilderness. Presence of mining claims could in the future present a management problem if they were proven valid and developed.

51-7 The BLM inventoried the land in the Esmeralda-Southern Nye Planning Area in 1979 and published the findings and proposed decisions for designating wilderness study areas in April 1980. The inventory proposal for Silver Peak was to not identify the area as a wilderness study area (WSA). After considering the inventory information, along with the comments received from a 90 - day public comment period, the BLM's Nevada State Director decided to include 33,900 acres of the Silver Peak area as a WSA. The final inventory decisions were mailed to those people who had expressed interest and were published in the Federal Register on November 7, 1980.

The State Director's decision on Silver Peak, along with 22 other areas, was appealed by Mr. Walter Benoit to the Interior Board of Land Appeals (IBLA). On March 1, 1982, the IBLA affirmed the State Director's decision that all 23 areas were properly designated as WSAs.

53-1 The criteria used in the selection of the Preferred Alternative considered the mineral potential of the WSAs as opposed to wilderness values. The Preferred Alternative only recommended areas where the values of wilderness designation are capable of balancing the other resource values and uses which would be foregone due to wilderness designation.

53-2 This detailed information is documented in the Wilderness Technical Report prepared in conjunction with the RMP/EIS and available by request at the Las Vegas District Office.

53-3 Please see response 54-1.

53-4 To include every MOU cited in this document would add unnecessarily to its length and add little to its content. However, a copy of the MOU is available for review in the Las Vegas District Office.

53-5 Since Council of Environmental Quality Regulations (1502.15) state that only enough data to understand the effects of the Alternatives should be included in the description of the existing environment, it would not be appropriate to include a map.

Baseline data pertaining to these subjects are present on pages 43, 44, 46, 48, 49, and 51 of the draft RMP/EIS. Management actions pertaining to water quality are listed on RMP/EIS pages 9, 20 and 21 of the draft. Also see response 36-6.

53-6 Mitigating measures, if necessary, are integrated into "Management Guidance Common to all Alternatives" found in Chapter 2 of the draft and are not specifically identified as mitigating measures.

53-7 As stated on page 41 of the draft "Resources or uses not appearing in this chapter (Affected Environment) are not expected to be affected by any of the proposed alternatives." Air quality falls into this category and was not included in the RMP/EIS.

53-8 The proposed RMP includes a measure for vegetative manipulation on 1195 acres or .03 percent of the RMP area. The method for this manipulation has not been determined and could include burning and/or spraying. The method will be determined during allotment management planning only if the brush control proposal is carried through to that stage. If spraying is selected, it will be analyzed in detail through the environmental assessment process. This analysis will include type of herbicide, location, acreage, target species, and environmental impacts. Herbicide application will conform to all federal, state and local regulations.

As a result of this court case the BLM will perform a worst case analysis prior to using herbicides on public lands.

60-1 Please see response 18-1.

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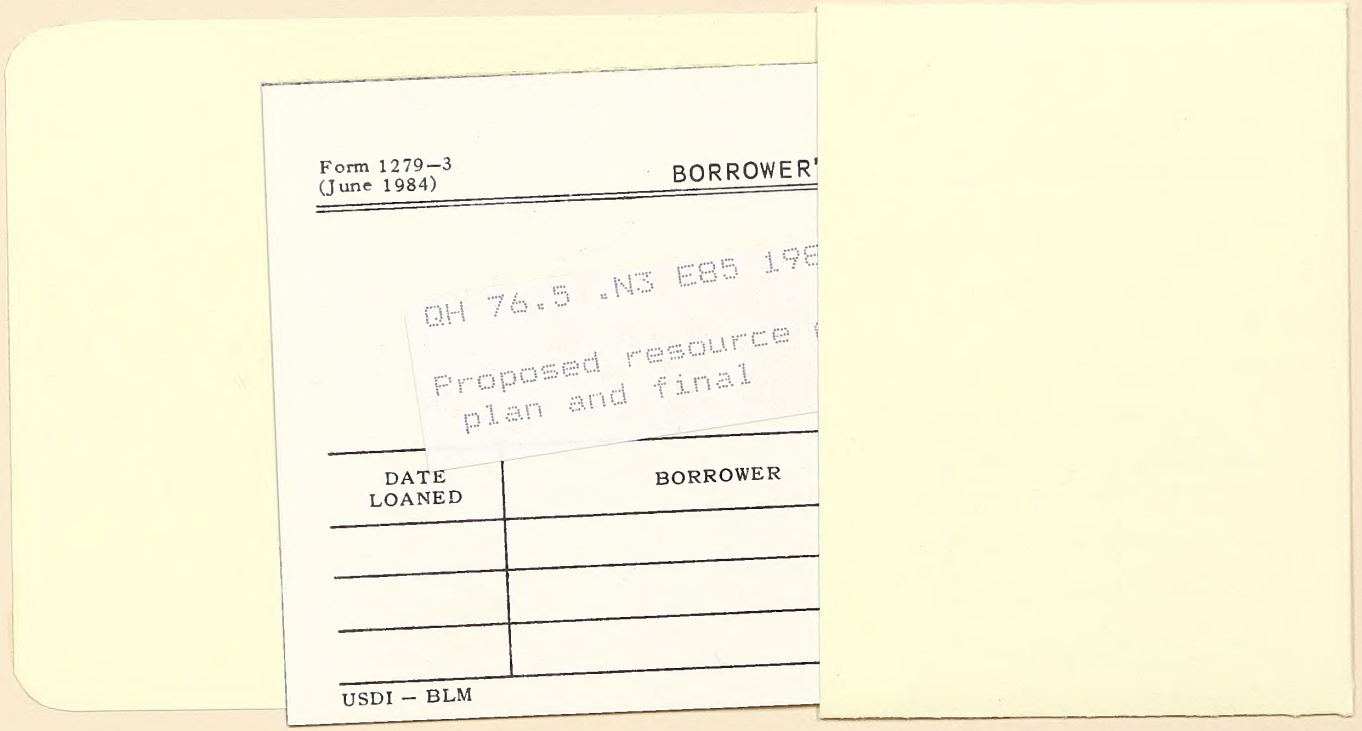
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